

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<hr/> In re: ALEXANDER E. JONES, Debtor. <hr/>	§ § § § § § §	Chapter 7 Case No. 22-33553 (CML)
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**SUMMARY COVERSHEET TO THE FIRST INTERIM FEE APPLICATION
OF JONES MURRAY LLP, AS BANKRUPTCY COUNSEL FOR CHAPTER 7
TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM JUNE 14, 2024 THROUGH AND INCLUDING OCTOBER 31, 2024**

Name of Applicant:	Jones Murray LLP	
Applicant's Role in Case:	Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray	
Date Order of Appointment Signed:	July 30, 2024 (Doc. No. 794)	
	Beginning of Period	End of Period
Time period covered by this Application:	06/14/2024	10/31/2024
Time period(s) covered by prior Applications:	N/A	N/A
Total amounts awarded in all prior Applications:	N/A	
Total fees requested in this Application and in all prior Applications:	\$427,773.00 ¹	
Total fees requested in this Application:	\$427,773.00	
Total professional fees requested in this Application:	\$427,773.00	
Total actual professional hours covered by this Application:	664.90	
Average hourly rate for professionals:	\$685.84	
Total paraprofessional fees requested in this Application:	\$4,541.00	
Total paraprofessional hours covered by this Application:	47.8	

¹ JM's fee statement for the August 1 to August 31 time period contained an inadvertent typo, resulting in a \$10.00 overstatement of the total fees incurred. JM's fee statement for the September 1 to September 30 tie period contained an inadvertent typo, resulting in an understatement of \$0.50 of the total fees incurred. In sum, the total of all fees requested in monthly fee statements included in this Application was overstated by \$9.50. JM has reduced the total fees requested in this Application by \$9.50 to correct these typos.

Average hourly rate for paraprofessionals:	\$95.00
Reimbursable expenses sought in this Application:	\$5,442.62
Application Cost (estimated; not included in above fees):	N/A
Total of other payments paid to secured claimants	\$0.00
Total of other payments paid to administrative claimants	\$1,707,192 ²
Estimated Total for distribution to priority unsecured creditors	Unknown ³
Estimated percentage dividend to priority unsecured creditors	Unknown ⁴
Estimated total for distribution to general unsecured creditors	Unknown ⁵
Estimated percentage dividend to general unsecured creditors	Unknown ⁶
Receipts to date in Chapter 7 as of October 31, 2024	\$ 9,284,193 ⁷
Disbursements to date in Chapter 7 as of October 31, 2024	\$1,707,192 ⁸
Current balance in the Trustee's accounts as of October 31, 2024	\$ 7,577,001 ⁹

² Does not include cash in operating FSS accounts.

³ Distributions will depend on results of upcoming auctions and litigations.

⁴ Distributions will depend on results of upcoming auctions and litigations.

⁵ Distributions will depend on results of upcoming auctions and litigations.

⁶ Distributions will depend on results of upcoming auctions and litigations.

⁷ Does not include cash in operating FSS accounts.

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⁹ Does not include cash in operating FSS accounts.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

ALEXANDER E. JONES,

Debtor.

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§ Chapter 7

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§ Case No. 22-33553 (CML)

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**FIRST INTERIM FEE APPLICATION
OF JONES MURRAY LLP, AS BANKRUPTCY COUNSEL FOR CHAPTER 7
TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM JUNE 14, 2024 THROUGH AND INCLUDING OCTOBER 31, 2024**

This application seeks an order that may adversely affect you. If you oppose the application, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the application and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the application at the hearing.

Represented parties should act through their attorney.

**TO THE HONORABLE CHRISTOPHER M. LOPEZ,
UNITED STATES BANKRUPTCY JUDGE:**

Jones Murray, LLP (“*JM*” or the “*Applicant*”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “*Trustee*”), files this First Interim Application for Payment of Compensation and Reimbursement of Expenses for the period from June 14, 2024 through and including October 31, 2024 (the “*Application Period*”), and respectfully represents as follows:

JURISDICTION

1. JM submits this Fee Application pursuant to section 330 of title 11 of the United States Code (the “***Bankruptcy Code***”), Rule 2016 of the Federal Rules of Bankruptcy Procedures (the “***Bankruptcy Rules***”), and Rule 2016-1 of the Bankruptcy Local Rules (the “***Local Rules***”).

2. The Court has jurisdiction over the Application pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. § 1408.

RELIEF REQUESTED

3. JM requests that the Court enter an order (i) allowing JM’s compensation for professional and paraprofessional services to the Trustee rendered during the Application Period in the amount of **\$427,773.00** and reimbursement of actual and necessary expenses incurred by JM in the amount of **\$5,442.62**; and (ii) award and order to be paid to JM the balance of any such fees and costs paid from funds available in the Debtor’s estate.

BACKGROUND

A. Bankruptcy Case Background

4. On July 29, 2022, Free Speech Systems, LLC (“***FSS***”) filed its voluntary petition for relief under chapter 11 subchapter V of the Bankruptcy Code (the “***FSS Case***”).

5. On December 2, 2022 (the “***Petition Date***”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (prior to the Conversion Date, the “***Jones Chapter 11 Case***”, and after the Conversion Date, the “***Jones Chapter 7 Case***”). The Debtor is an employee of FSS. 100 percent of the outstanding membership interests in FSS are owned by the Debtor’s bankruptcy estate.

6. On December 13, 2022, the United States Trustee for Region 7 (Southern and Western Districts of Texas) (the “**U.S. Trustee**”) appointed the Official Committee of Unsecured Creditors in the Jones Chapter 11 Case pursuant to Bankruptcy Code section 1102(a)(1).

7. The Debtor continued managing his assets as debtor and debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code until the Court entered its *Order Converting Debtor’s Chapter 11 Case to a Case Under Chapter 7 of the Bankruptcy Code* [Docket No. 708] on June 14, 2024 (the “**Conversion Date**”). On June 21, 2024, the Court entered an order dismissing the FSS Case [Case No. 22-60043, Docket No. 956] (the “**Dismissal Order**”), while retaining exclusive jurisdiction over several adversary proceedings and the approval of professional fees and expenses, as supplemented by the Supplemental Dismissal Order (as defined below). On the Conversion Date, the U.S. Trustee appointed Christopher R. Murray as the Chapter 7 Trustee in the Jones Chapter 7 Case.

8. On August 22, 2024, the Trustee filed the *Trustee’s Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC* [Docket No. 829].

9. On September 25, 2024, the Court entered the *Order Supplementing Order Dismissing Case* [Case No. 22-60043, Docket No. 1021] (the “**Supplemental Dismissal Order**”), which provided that effective as of the entry of the Dismissal Order, the property of FSS’s bankruptcy estate was deemed vested in the bankruptcy estate of Jones as property of his estate to be administered by the Trustee.

10. On September 25, 2024, the Court entered the Winddown Order, and the Trustee and his professionals are proceeding to auction and sell the assets of FSS.

B. JM Retention and Fees

11. On July 3, 2024, Trustee filed the *Application to Employ Jones Murray LLP as General Bankruptcy Co-Counsel for the Chapter 7 Trustee* [Docket. No. 755], which the Court approved on July 30, 2024 [Docket No. 794].

12. On July 30, 2024, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the “*Interim Compensation Order*”).

13. This is JM’s first interim fee application in the Jones Chapter 7 Case. During the Application Period, JM filed five (5) monthly fee statements, which are attached hereto as **Exhibit 3**, and are summarized below:

Period	Expenses Incurred	Fees Incurred	Total Fees and Expenses Paid	Amount Outstanding
06/14/24-06/30/24	\$1,104.18	\$86,575.00	\$70,364.18	\$17,315.00
07/01/24-07/31/24	\$1,391.23	\$74,039.50	\$60,622.83	\$14,807.90
08/01/24-08/31/24	\$0.00	\$76,444.50	\$61,163.60	\$15,290.90
09/01/24-09/30/24	\$1,588.60	\$117,060.50	\$95,236.60	\$23,412.00
10/01/24-10/31/24 ¹	\$1,358.61	\$76,653.50	\$60,281.41	\$14,370.70
Total:	\$5,442.62	\$427,773.00²	\$347,659.12	\$85,547.00

14. This Fee Application requests that the Court enter an order (i) allowing JM’s compensation for professional and paraprofessional services to the Trustee rendered during the Application Period in the amount of **\$427,773.00** and reimbursement of actual and necessary

¹ The objection deadline to JM’s Fifth Monthly Fee Statement (October 1, 2024 to October 31, 2024) is November 18, 2024. JM does not anticipate any objections to its Fifth Monthly Fee Statement and anticipates that it will receive payment in accordance with the Interim Compensation Order prior to entry of an order approving this Application. This line reflects receipt of that anticipated payment.

² JM’s fee statement for the August 1 to August 31 time period contained an inadvertent typo, resulting in a \$10.00 overstatement of the total fees incurred. JM’s fee statement for the September 1 to September 30 tie period contained an inadvertent typo, resulting in an understatement of \$0.50 of the total fees incurred. In sum, the total of all fees requested in monthly fee statements included in this Application was overstated by \$9.50. JM has reduced the total fees requested in this Application by \$9.50 to correct these typos.

expenses incurred by JM in the amount of **\$5,442.62** and (ii) award and order to be paid to JM the balance of any such fees and costs paid from funds available in the Debtor's estate. Summary calculations of these fees and expenses are attached hereto as **Exhibit 2** and **Exhibit 4**, respectively.

15. The fees and expenses requested are reasonable and all amounts requested were for actual and necessary services rendered on behalf of the Trustee.

16. JM reserves the right to request additional compensation for the Application Period to the extent that it is later determined that time or disbursement charges for services rendered or disbursements incurred during such time period have not yet been submitted.

18. No agreement or understanding exists between JM and any other entity for sharing of any compensation or reimbursement in this case.

19. JM has provided the information required by the U.S. Trustee's Guidelines and the Interim Compensation Order.

20. JM has served as general bankruptcy co-counsel to the Trustee and, in that capacity, has rendered legal services for the benefit of the Trustee and the Debtor's estate.

STANDARDS RELEVANT TO AWARDING REASONABLE COMPENSATION

21. Section 330 of the Bankruptcy Code authorizes the Court to award JM reasonable compensation for its actual and necessary services rendered and reimbursement of its actual and necessary expenses incurred in the rendering of services as special counsel to the Trustee. Section 330 provides:

- (a)(1) After notice to the parties in interest and to the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a trustee, a consumer privacy ombudsman appointed under section 332, an examiner, an ombudsman appointed under section 333, or a professional person employed under section 327 or 1103:

- (A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person or attorney and by any paraprofessional person employed by any such person; and
- (B) reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1).

22. This Fee Application substantiates the total amount that JM seeks for fees and expenses in accordance with each element of the customary standards applied to fee applications. These standards are set forth in (i) Bankruptcy Rule 2016 and (ii) *In re First Colonial Corp. of America*, 544 F.2d 1291 (5th Cir. 1977), *cert. denied*, 431 U.S. 904 (1977).

23. In *First Colonial*, the Fifth Circuit adopted the following twelve factors to apply to the determination of awards of attorneys’ fees in bankruptcy cases: (i) time and labor required; (ii) the novelty and difficulty of the questions; (iii) the skill requisite to perform the legal service properly; (iv) the preclusion of other employment by the professional due to acceptance of the case; (v) the customary fee; (vi) whether the fee is contingent or fixed; (vii) time limitations imposed by the client or the circumstances; (viii) the amount involved and the results obtained; (ix) the experience, reputation and ability of the attorneys; (x) the “undesirability” of the case; (xi) the nature and length of the professional relationship with the client; and (xii) awards in similar cases. *First Colonial*, 544 F.2d at 1298-99. These factors were taken from *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974), a non-bankruptcy case, and are commonly referred to as the “*Johnson* factors.” The original *Johnson* factors, as embraced by *First Colonial*, remain applicable to the determination of reasonableness of fees awarded under the Bankruptcy Code. See 15 King, *Collier on Bankruptcy*, ¶ 330.04[3] at 330-35 to 330-41. A majority of the *Johnson* factors are now codified under Bankruptcy Code Section 330(a). *Id.*

24. The Fifth Circuit has rejected the “hindsight” or “material benefit” standard that was originally set forth in *In re Pro-Snax Distributors, Inc.*, 157 F.3d 414 (5th Cir. 1998). In its place, the Fifth Circuit enunciated a new, prospective standard based on whether the services of counsel were reasonably likely to benefit the estate at the time such services were rendered. *See In re Woerner*, 783 F.3d 266, 276 (5th Cir. 2015). All services rendered by JM satisfy the *Woerner* standard because they were reasonably likely to benefit the estate at the time rendered.

NATURE AND EXTENT OF SERVICES PROVIDED BY JM

25. JM classified all services performed for which compensation is sought in eight (8) categories. JM attempted to divide its services rendered to the Trustee in these bankruptcy cases into appropriate categories. However, because certain services may relate to more than a single category, services pertaining to one category may be included in another category. Copies of JM’s monthly fee statements are attached hereto as **Exhibit 3** in accordance with the Court’s procedures and provide detailed descriptions of the services JM rendered with respect to each of these categories. A summary of compensation requested by project category is attached hereto as **Exhibit 2**.

A. Asset Analysis and Recovery

26. The majority of time billed by JM in this category during the Application Period related to planning and negotiating the auction and sale process estate assets, drafting sale motions and orders relating to estate assets, the transition of the Jones bankruptcy case and the FSS assets from chapter 11 to chapter 7, evaluation of ongoing business operations and various matters relating thereto, ongoing meetings and communications with professionals and potential bidders, evaluation of causes of action, evaluation of recovery from pending litigation, evaluation of

claimed exemptions and value of non-exempt assets, evaluation of partition agreement with Erika Jones, and evaluation of assets in various trusts.

27. Services rendered in this category included, but were not limited to, (i) ongoing meetings with the Trustee's team regarding case status, management of various projects and sales of assets; (ii) analyzing ownership of assets of the Jones estate and FSS and various trusts formed by Jones or for which he serves as trustee; (iii) negotiating and drafting sales contract, closing documents, emergency motion, and witness/exhibit list relating to the sale of non-exempt real property owned by Jones [Docket No. 837]; (iv) assisting in the drafting and revising of the *Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC* [Docket No. 829]; (v) negotiating the *Order Granting Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC* [Docket No. 859] (the "Winddown Order"), including resolution of objections through language to same; (vi) assisting in the drafting and revising of the *Trustee's Emergency Motion for Entry of an Order Authorizing (I) the Sale of Intellectual Property Assets in Connection with the Winddown of Free Speech Systems, LLC and (II) the Assumption and Assignment of Executory Contracts* [Docket No. 882] (the "Jones IP Assets Sale Motion"); (vii) ongoing negotiations with Debtor's counsel regarding the order approving the Jones IP Assets Sale Motion; (viii) ongoing communications with potential bidders for FSS assets; (ix) assisting with drafting the form asset purchase agreement in connection with the FSS asset auction; (x) analyzing potential recoveries from pending litigation and potential causes of action; (xi) attending to business transition, ongoing operations of FSS by Trustee, and labor and employment and compensation issues; (xii) analyzing issues related to intellectual property; (xiii) negotiating potential settlements regarding the disposition and apportionment of estate assets and their proceeds; (xiv) analyzing case law related to the ownership and disposition of estate property

and corporate authority; (xv) managing the transition of the Jones estate and FSS assets into chapter 7; (xvi) attending to professional fee issues and drafting stipulations extending objection deadlines; (xvii) assisting with the preparation of a subpoena of Unsecured Creditors' Committee information and documents; (xviii) reviewing and analyzing document production with respect to various investigations into potential causes of action; (xix) analyzing Alex Jones and FSS schedules and statements of financial affairs; (xx) evaluation of claimed exemptions and negotiation of various extension of deadline to object to same and negotiations with Jones's counsel regarding same; (xxi) analyzing partition agreement with respect to Jones assets; (xxii) analyzing undisclosed assets with respect to nature of alleged "liberty interests"; (xxiii) analyzing cash held in debtor-in-possession account and negotiate turnover of same to Trustee; (xxiv) evaluating recoveries in various pending litigation matters; (xxv) evaluating issues of corporate authority; and (xxvi) preparing witness and exhibit lists for hearings relating to sale of assets.

28. JM expended 341.3 hours of time to provide such services. Professional fees in this category total \$230,481.50.

B. Asset Disposition

29. Time billed by JM in this category during the Application Period related to the consummation of the sale of non-exempt real property owned by Jones (i.e. the "Lake House") [Docket No. 837] and attending to matters relating to the negotiation of final closing documents and advising the Trustee regarding the closing of same.

30. JM expended 9.7 hours of time to provide such services. Professional fees in this category total \$6,688.50.

C. Assumption and Rejection of Executory Contracts/Leases

31. Time billed by JM in this category during the Application Period related to the evaluation of various executory contracts and leases, negotiations and communications with the FSS landlord regarding the current lease of the FSS facility, and negotiating and preparing motions to extend the deadline to assume or reject executory contracts and/or leases under 11 U.S.C. §365.

32. JM expended 7.3 hours of time to provide such services. Professional fees in this category total \$4,394.00.

D. Case Administration

33. The majority of time billed by JM during the Application Period in this category related to ensuring the efficient and smooth administration of legal services related to the Jones Chapter 7 Case. In particular, services rendered in this category during the Application Period included, but were not limited to, (i) meetings with Trustee legal team and other professionals regarding the management and administration of the bankruptcy case and the coordinating regarding pending tasks and projects relating to same; (ii) managing and administering the bankruptcy case, such as maintenance of case calendars, task lists, docket updates, and ongoing scheduling of key deadlines; (iii) coordinating filing and service of motions and orders; (iv) coordinating hearing logistics, including preparing and filing witness and exhibit lists in advance of hearings; and (v) ensuring compliance with service and notice requirements. As these tasks occurred in relation to various actions across various billing categories, some of the time in this category could also be categorized under Asset Analysis and Review, Litigation and Other Contested Matters, and Claims Analysis and Objections,

34. JM expended 93.7 hours of time to provide such services. Professional fees in this category total \$56,790.00.

E. Claims Administration and Objections

35. The majority of time billed by JM during the Application Period in this category related to the evaluation of the relationship of PQPR to FSS and the Debtor, evaluation of the claimed lien, evaluation of the pending lien avoidance litigation with PQPR, evaluation of issues relating to corporate authority and the financial records of PQPR and its insiders and affiliates, analysis of potential resolutions of disputes with PQPR regarding its alleged debt and lien, negotiation of potential resolution with PQPR regarding its alleged debt and lien, communications with key stakeholders regarding concepts for potential resolution of disputes with PQPR. In this category, JM also provided services relating to the pending objections filed by Jones prior to conversion relating to the claims of the Connecticut and Texas families and negotiation of extension relating to same. JM also provided services in this category relating to the evaluation of the status of underlying litigation and appeals between Jones, FSS, Connecticut families, and Texas families in various courts as well as the status of pending non-dischargeability litigation in this case.

36. JM expended 69.9 hours of time to provide such services. Professional fees in this category total \$35,771.50.

F. Employment/Fee Applications

37. The majority of time billed by JM during the Application Period in this category related to preparation of employment applications and the interim compensation motion, and the preparation of JM's monthly fee statements during the Application Period. Services rendered in this category included, but were not limited to, (i) drafting, revising, and filing JM's employment application [Docket No. 755]; (ii) drafting and revising Tranzon360's employment application [Docket No. 828]; (iii) drafting and revising the interim compensation motion [Docket No. 757];

(iv) drafting, revising, and filing JM's interim fee statements; (v) corresponding about and coordinating service for monthly fee statements; (vi) attending to matters relating to professional fees incurred by estate professionals in the Jones Case and FSS case prior to conversion and dismissal (respectively); (vii) negotiating, drafting, and filing motion to employ a real estate broker to assist with the sale of the Lake House [Docket No. 535]; (viii) negotiating, drafting, and filing motion to employ N&N Forensics as IT specialists for the estate; (ix) beginning discussions with potential financial advisors to assist in review of monthly operating reports and evaluation of potential causes of action; and (x) corresponding with JM team, co-counsel at Porter Hedges LLP and Trustee's team regarding fee statements and applications.

38. JM expended 41.00 hours of time to provide such services. Professional fees in this category total \$21,253.00.

G. Litigation/Other Contested Matters

39. The majority of time billed by JM during the Application Period in this category related to analyzing, managing, and engaging in motion practice related to state court litigation and other pending adversary proceedings.

40. Services rendered in this category also included, but were not limited to, (i) analyzing and responding on an emergency basis to the garnishment sought and the *ex parte* turnover order entered in the state court action styled *Neil Heslin and Scarlett Lewis v. Alex E. Jones and Free Speech Systems, LLC*, Cause No. 2-1-GN-18-01835; (ii) removal of those state law proceedings to federal court; (iii) analyzing and responding to Garnishment action advising the Trustee regarding and drafting and revising, the *Trustee's Emergency Motion to (1) Clarify Transfer of Control and Signing Authority with Respect to Debtor's Bank Accounts, (2) for an Order Extending Automatic Stay in the Alex Jones Case to Free Speech Systems, LLC, and (3)*

Related Relief [Docket No. 720] (“Motion to Clarify”); (iv) advising the Trustee regarding and drafting and revising motions to transfer venue from the Western District of Texas; (iv) preparing for the hearing on Motion to Clarify; (v) drafting motions for extension of time to file responses to Texas Plaintiffs’ motion to remand; (vi) analyzing case law regarding transferring venue and standards for remand; (vii) ongoing conferences with Texas Plaintiffs and Connecticut Plaintiffs regarding state court actions; (viii) drafting a response to Texas Plaintiffs’ motion to remand; (ix) analyzing claims against PQPR in *Free Speech Systems, LLC v. PQPR Holdings Limited, LLC, et al.*, Adv. No. 23-03127; (x) analyzing legal issues with the appeal of the Supplemental Dismissal Order and preparation for initial appellate filings; (xi) ongoing negotiations with parties in the case regarding settlement of adversary proceedings and state court litigation; (xii) evaluation of claims in pending adversary proceeding with ESG and negotiation with counsel of record for parties in that adversary proceeding; and (xiii) drafting form motion to enforce the automatic stay against potential stay violators.

41. JM expended 100.90 hours of time to provide such services. Professional fees in this category total \$71,569.50.

H. Stay Relief

42. The time JM spent in this category relates to a motion filed to lift the stay regarding a vehicle owned by Jones. JM evaluated the motion, advised the Trustee regarding position on relief requested, and represent Trustee at hearing in which Movant failed to appear and the motion was denied.

43. JM expended 1.1 hours of time to provide such services. Professional fees in this category total \$825.00.

ADDITIONAL STANDARDS FOR AWARDING OF ATTORNEYS' FEES

A. NOVELTY AND DIFFICULTY OF LEGAL PROBLEMS INVOLVED

44. The first *Johnson* factor examines the degree of novelty and difficulty of the issues encountered by JM. With respect to the matters described herein, numerous difficult and complex legal problems have been addressed and considered by JM, all of which have required knowledge of the application of the Bankruptcy Code, the Bankruptcy Rules, state and federal law, and court decisions interpreting the same.

B. CUSTOMARY FEE

45. The next relevant factor to be considered is the reasonable hourly rate by which the reasonable number of hours expended by JM are to be multiplied. Subsumed in this analysis are the following guidelines, as noted in *Johnson*: the customary fee charged by the applicant, awards in similar cases, the level of skill necessary, the amount involved, the results obtained, the reputation of the professional and the undesirability of the case.

46. JM's hourly billing rates are computed at the rates JM regularly charges its hourly clients.

47. The hourly rates charged by JM are also lower than or commensurate with the customary fees charged by professionals of similar experience, reputation and abilities in this community, as well as those rates charged regionally and nationally. Additionally, the hourly rates charged by JM are consistent with the amount involved in these cases, the results obtained by JM, and the level of skill necessary to perform the work. Accordingly, the hourly billing rates charged by JM are reasonable.

C. SKILL REQUIRED FOR PERFORMANCE OF LEGAL SERVICES

48. The number of difficult issues and matters addressed in these cases has required a high degree of skill and expertise. JM's attorneys, with varying levels of experience and seniority, have been used effectively and efficiently to perform the tasks assigned to them and have provided valuable and effective assistance to the Trustee. A thorough understanding of the Bankruptcy Code and Bankruptcy Rules together with other state and federal law was blended with business expertise to assist the Trustee. In addition, multiple issues in these bankruptcy cases, including, but not limited to, the dismissal of the FSS Case, ongoing litigation related to the FSS Case and the Jones Case, the potential sales of Jones and FSS, potential litigation relating to transfers to the Debtor and insiders, potential litigation relating to claimed exemptions, and the evaluation of certain trusts set up by Jones or for which Jones is the trustee, have required additional expertise from JM's attorneys. The compensation requested by JM is consistent with the compensation awarded in other cases of similar size and complexity.

D. RESULTS OBTAINED

49. JM's services in this case have assisted the Trustee in his efforts to maximize the value of the estates and efficiently administer these cases. These cases have been handled in a professional and cost-effective manner. The requested compensation is reasonable in view of the time expended, the parties involved, and the results obtained in these cases.

E. EXPERIENCE, REPUTATION, AND ABILITY OF JM

50. JM's attorneys, over many years, have appeared throughout the United States providing legal representation to trustees, debtors, secured creditors, unsecured creditors, and creditors' committees in proceedings under the Bankruptcy Code. Further, partners of JM, including those who have provided legal services in the instant cases, have for many years actively

participated in leadership positions in various professional organizations and bar associations, and have written for local and national publications and spoken at local, state and national institutes for continuing legal education in the area of bankruptcy, creditors rights, restructuring, and fiduciary litigation. JM's attorneys are experienced in all aspects of bankruptcy matters, possess a high level of expertise, and have an excellent reputation in the business and legal communities. Furthermore, JM has particular experience in the areas of insolvency, workouts and corporate reorganization, and the representation of trustees in bankruptcy proceedings.

F. CONTINGENT NATURE OF FEES AND UNDESIRABILITY OF CASE

51. No contingent fees are requested in these cases.

G. TIME LIMITATIONS IMPOSED BY THE CASE

52. The time demands of this representation have, at times, been significant for JM but JM has worked quickly, diligently, and efficiently to address the serious challenges faced by the Debtor's estate within the Application Period.

53. These fees and costs were necessary for the proper and successful administration of the bankruptcy cases. JM made every effort to keep all fees and costs to a minimum.

54. At all times covered by this Fee Application, JM diligently fulfilled its duty as bankruptcy counsel for the Trustee. All services rendered by JM benefitted the estates at the time that such services were rendered. Services performed by JM throughout these cases were done in a professional, skilled, and expeditious manner, requiring substantially less time than would have been required by counsel with less experience. Every action of JM was taken to reduce the legal hours expended and matters not demanding the services of senior attorneys were assigned to junior associates, or paralegals.

55. No agreement exists between JM and any other person, firm or entity for division or sharing of compensation in these cases.

56. The above narrative portion of this Fee Application is primarily intended to serve as a summary recapitulation of the major areas of JM's activities and responsibilities. The exhibits provide complete summaries of the acts taken by JM on behalf of the Trustee during these cases.

WHEREFORE, JM requests that the Court enter an order (i) allowing JM's compensation for professional and paraprofessional services to the Trustee rendered during the Application Period in the amount of **\$427,773.00** and reimbursement of actual and necessary expenses incurred by JM in the amount of **\$5,442.62**; and (ii) award and order to be paid to JM the balance of any such fees and costs paid from funds available in the Debtor's estate.

Dated: November 14, 2024.
Houston, Texas

Respectfully Submitted,

JONES MURRAY LLP

By: /s/ Erin E. Jones
Erin E. Jones (Bar No. 24032478)
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Houston, Texas 77007
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Facsimile: (832) 529-3633
erin@jonesmurray.com

*Co-Counsel for the Chapter 7
Trustee, Christopher R. Murray*

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on November 14, 2024.

/s/ Erin E. Jones

Erin E. Jones

EXHIBIT 1**TIMEKEEPER SUMMARY**

Professional	Title	Rate	Total Hours	Total Fees
Erin E. Jones	Partner	\$ 750.00	485.4	\$156,492.00
Jacqueline O. Chiba	Associate	\$ 495.00	131.7	\$161,875.00
Apollo Pham	Paralegal	\$ 95.00	40.4	\$3,854.00
Joshua Sosa	Paralegal	\$ 95.00	7.4	\$7,579.50

EXHIBIT 2**PROJECT CATEGORIES**

Project Category	Total Hours	Total Fees Requested
Asset Analysis and Recovery	341.3	\$230,481.50
Asset Disposition	9.7	\$6,688.50
Assumption and Rejection of Contracts/Leases	7.3	\$4,394.00
Claims Administration and Objections	93.7	\$56,790.00
Case Administration	69.9	\$35,771.50
Employment/Fee Application	41	\$21,253.00
Litigation/Contested Matters	100.9	\$71,569.50
Stay Litigation	1.1	\$825.00
<u>TOTAL</u>	664.9	\$427,773.00

EXHIBIT 3

MONTHLY FEE STATEMENTS

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES Debtor.	§ § § § §	Case No. 22-33553 (Chapter 7)
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**FIRST MONTHLY FEE STATEMENT OF JONES MURRAY LLP AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR
ALLOWANCE OF COMPENSTION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM JUNE 14, 2024 THROUGH JUNE 30, 2024**

Name of Applicant:	Jones Murray LLP, as proposed bankruptcy counsel for Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	Application Pending at Dkt. No. 755
Period for which Fees and Expenses are Incurred:	June 14, 2024 through and including June 30, 2024
Interim Fees Incurred:	\$86,575.00
Interim Payment of Fees Requested (80%):	\$69,260.00
Interim Expenses Incurred:	\$1,104.18
Total Fees and Expenses Due:	\$70,364.18

This is the First Monthly Fee Statement.

Jones Murray LLP (“JM”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this First Monthly Fee Statement (the “Fee Statement”) for the period from June 14, 2024 through June 30, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [pending, motion filed at Docket No. 757] (the “Interim Compensation Order”).

JM requests compensation for professional services rendered in the amount of \$86,575.00 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,104.18 (the “Expenses”), for the period from June 14, 2024 through June 30, 2024. Eighty percent (80%) of the fees equals \$69,260.00 and one hundred percent (100%) of the Expenses equals \$1,104.18 for a total requested amount of \$70,364.18.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by JM attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. JM’s invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, JM respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$69,260.00 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$1,104.18 in the total amount of \$70,364.18.

Dated July 22, 2024.

Respectfully submitted,

JONES MURRAY LLP

/s/ Erin E. Jones

Erin E. Jones

Texas Bar No. 24032478

erin@jonesmurray.com

602 Sawyer St., Suite 400

Houston, TX 77007

Tel. (832) 529-1999

CO-COUNSEL FOR THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on July 22, 2024.

/s/ Erin E. Jones

Erin E. Jones

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	34.5	\$25,875.00
Case Administration	25.4	\$17,506.50
Claims Administration and Objections	10.2	\$2,999.50
Employment/Fee Application	3.4	1,759.50
Litigation/Contested Matters	52.3	\$38,434.50
TOTAL	125.8	\$86,575.00

EXHIBIT 2

SUMMARY OF OUT OF POCKET EXPENSES

Expense Description	Cost
Filing/Court Fees	\$750.00
Postage/Copies – Mailout	\$404.18
TOTAL EXPENSES	\$1,104.18

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY BILLING PROFESSIONALS

Professional	Hourly Rate	Total Hours
Erin E. Jones, <i>Partner</i>	\$750.00	108.8
Jacqueline Q. Chiba, <i>Associate</i>	\$495.00	8.4
Apollo Pham, <i>Paralegal</i>	\$95.00	8.6
TOTAL		125.8

Exhibit 4

Jones Murray LLP

602 Sawyer St, Ste 400
Houston, TX 77007

INVOICE

Invoice # 5
Date: 07/22/2024

Christopher Murray, Chapter 7 Trustee
602 Sawyer Street, Suite 400
Houston, TX 77007

00040-Christopher Murray, Chapter 7 Trustee**In re Alexander E. Jones**

Type	Date	Notes	Quantity	Rate	Total
Service	06/14/2024	Case Administration: Post-hearing meeting/work session with C. Murray regarding action items and case administration (1.3); telephone conference with J. Wolfshohl and C. Murray regarding same (1.0)	2.30	\$750.00	\$1,725.00
Service	06/14/2024	Case Administration: Attend hearings on conversion of Jones case and dismissal or conversion of FSS case in relation to administration of Jones chapter 7 estate (8.0); various conferences with counsel for parties after hearing to set up meetings, including UCC, Connecticut families, Texas families, FSS, A. Jones, and PQPR (.5)	8.50	\$750.00	\$6,375.00
Service	06/14/2024	Claims Administration and Objections: meeting with counsel for PQPR (.7); conference with C. Murray regarding PQPR lien issues and review docket regarding same (.6)	1.30	\$750.00	\$975.00
Service	06/14/2024	Case Administration: AP: Assist E. Jones by identifying and downloading relevant pleadings and documents from the bankruptcy cases documents and preparing for a share file (1.5)	1.50	\$95.00	\$142.50
Service	06/15/2024	Asset Analysis and Recovery: Telephone conference with C. Murray regarding FSS management and cash issues (.5); conference call with A. Catmull regarding management and cash issues (.7); work session with C. Murray regarding high priority asset management issues (1.0); review various emails regarding vendor payments (.3); conference call with A. Catmull regarding management and cash issues (.5); email with S. Lemmon to set time to discuss case issues (.1); review dockets for pending matters and deadlines (.6); begin to review dockets for key background pleadings, records, and organizational documents (1.2)	4.90	\$750.00	\$3,675.00
Service	06/16/2024	Asset Analysis and Recovery: Call with V. Driver, B. Schleizer, C. Stephenson, J. Wolfshohl, C. Murray	1.30	\$750.00	\$975.00

		regarding A. Jones case management issues and assets (.5); conference with C. Murray and J. Wolfshohl regarding issues raised in meeting with Debtor's team (.5); additional meeting with C. Murray regarding same (.3)			
Service	06/16/2024	Claims Administration and Objections: Call with S. Lemmon and C. Murray regarding PQPR lien issues, cash use, and other background information regarding corporate organizational and financial matters (1.1)	1.10	\$750.00	\$825.00
Service	06/16/2024	Case Administration: Work session with C. Murray regarding high priority issues relating to post-conversion transition (.7)	0.70	\$750.00	\$525.00
Service	06/17/2024	Case Administration: Various conferences with J. Wolfshohl and C. Murray regarding setting up meetings and agendas for discussions with key case constituents (.9)	0.90	\$750.00	\$675.00
Service	06/17/2024	Asset Analysis and Recovery: Review messages regarding interest in acquiring various assets and conference with C. Murray regarding same (.2)	0.20	\$750.00	\$150.00
Service	06/17/2024	Asset Analysis and Recovery: Extended telephone conference with J. Martin regarding Texas families' claim and other case background (1.2)	1.20	\$750.00	\$900.00
Service	06/17/2024	Asset Analysis and Recovery: Conference call with FSS team regarding transition issues and case background (1.0); conference with J. Wolfshohl and C. Murray regarding same (.4)	1.40	\$750.00	\$1,050.00
Service	06/17/2024	Case Administration: Review various emails with W. Cicack regarding payments for vendor and projections for next couple weeks of invoicing (.2); conference with C. Murray regarding same (.2)	0.40	\$750.00	\$300.00
Service	06/17/2024	Asset Analysis and Recovery: Review and respond to email inquiry regarding purchase of various nonexempt assets from Jones chapter 7 estate and conference with C. Murray regarding same (.3); review previous schedules regarding same (.2)	0.50	\$750.00	\$375.00
Service	06/17/2024	Claims Administration and Objections: Review background materials regarding PQPR lien and forward same to J. Wolfshohl (.5)	0.50	\$750.00	\$375.00
Service	06/17/2024	Claims Administration and Objections: Review stipulation between debtor and Texas families regarding claims allowance or estimation for chapter 11 purposes (.2)	0.20	\$750.00	\$150.00
Service	06/17/2024	Asset Analysis and Recovery: Review Sub V Trustee status report (.5); conference with C. Murray regarding same (.2); forward same to J. Wolfshohl (.1); review other background materials and start to work on	1.80	\$750.00	\$1,350.00

		categories of discovery needed (.8) and conference with C. Murray and J. Wolfshohl regarding same (.2)			
Service	06/17/2024	Asset Analysis and Recovery: Review Sub V Trustee status report (.5); conference with C. Murray regarding same (.2); forward same to J. Wolfshohl (.1); review other background materials and start to work on categories of discovery needed (.8) and conference with C. Murray and J. Wolfshohl regarding same (.2); review FSS company agreement (1.0) and conference with C. Murray regarding same (.2)	3.00	\$750.00	\$2,250.00
Service	06/18/2024	Asset Analysis and Recovery: Prepare for extended work session with Trustee's team regarding various assets and discovery matters as well as case administration (1.4); extended work session with Trustee' team regarding priority case administration issues, discovery, pending litigation, and asset evaluation (1.1); extended conference with FSS teams regarding operational issues, financial status, and cash management (2.0)	4.50	\$750.00	\$3,375.00
Service	06/19/2024	Asset Analysis and Recovery: Conference with J. Wolfshohl regarding case workflow and pending assignments (.2); conference with C. Murray regarding status of same (.2); telephone call with W. Cicack regarding case background and interest in acquisition of estate assets and related interests (.5); review schedules regarding potential sale concepts (.7); work session with C. Murray regarding same and status of meeting with various creditor groups (.3)	1.90	\$750.00	\$1,425.00
Service	06/19/2024	Claims Administration and Objections: AP: Begin to prepare claims analysis from Jones and FSS cases to compare claims and prepare spreadsheet for same (2.1)	2.10	\$95.00	\$199.50
Service	06/20/2024	Case Administration: Conference with C. Murray regarding Ct. family claims (.3); Conference call with counsel for Ct. families, C. Murray, and J. Wolfshohl (.8); conference with C. Murray and J. Wolfshohl regarding same (.5); review various emails regarding 341 meeting and need to re-set (.3); review various emails and conference with C. Murray regarding cash management and asset preservation (.5); research corporate governance issues and discuss same with C. Murray (.7)	3.10	\$750.00	\$2,325.00
Service	06/20/2024	Claims Administration and Objections: AP: Continue to work on claims analysis from Jones and FSS cases to compare claims, exhibits, and update spreadsheet for same (3.3)	3.30	\$95.00	\$313.50
Service	06/21/2024	Other Contested Matters: Review dismissal order and conference with C. Murray and J. Wolfshohl regarding same (.5)	0.50	\$750.00	\$375.00

Service	06/21/2024	Other Contested Matters: Review various emails regarding motion for turnover and application for garnishment filed by Texas families in state court in Austin (.7); review non-file stamped copies of same forwarded by other parties in the state court litigation copied on email between Texas families' counsel and state court clerk (.9); extended work session and multiple calls with J. Wolfshohl and C. Murray regarding same (1.5); search for and review state court docket regarding turnover order (1.0); search for garnishment action in state court but not found due to incorrect case number in style and logistical delay in docketing in separate action (1.0); obtain copy of turnover order and review together with Bankruptcy Court order of dismissal (.6); conference with C. Murray regarding same (.5); begin to work on motion to enforce dismissal order and conference with C. Murray and J. Wolfshohl regarding same (.8); begin to draft notice of removal for case in which turnover order was entered (2.5)	9.50	\$750.00	\$7,125.00
Service	06/21/2024	Claims Administration and Objections: AP: Continue to work on claims analysis from Jones and FSS cases to compare claims, exhibits, and update spreadsheet for same (1.7)	1.70	\$95.00	\$161.50
Service	06/22/2024	Other Contested Matters: Various conference calls with J. Chiba and C. Murray regarding removal of state court matter (1.2); review and discuss motion to enforce or clarify dismissal order with C. Murray and J. Wolfshohl (2.3); review various drafts and revisions to same (1.5); continue to draft removal and related documents (.7); research regarding garnishment action in state court (1.0); research regarding corporate governance issues and conference with C. Murray regarding same (3.6)	10.30	\$750.00	\$7,725.00
Service	06/23/2024	Other Contested Matters: Continue to work through drafts of motion to enforce or clarify dismissal order and several extended conferences with C. Murray and trustee team regarding same (3.9); conference call with V. Driver and C. Murray regarding turnover issues and corporate governance issues (.6); extended work session with C. Murray on effect of turnover order on case administration and research regarding same (2.0)	6.50	\$750.00	\$4,875.00
Expense	06/24/2024	Court Fee/Filing Fee: Filing Fee - Notice of Removal Adv. Proceeding 22-01034	1.00	\$350.00	\$350.00
Expense	06/24/2024	Court Fee/Filing Fee: Filing Fee - Notice of Removal Adv. Proceeding 22-01035	1.00	\$350.00	\$350.00
Service	06/24/2024	Other Contested Matters: Finalize notice of removal to be filed in federal court in matter where turnover order was entered (3.5); conference call regarding how to file in WDTX bankruptcy court as ancillary proceeding (.3); prepare notice of filing notice of removal to be filed in state court action that was removed (.8); draft separate notice of removal of state court garnishment case after	11.80	\$750.00	\$8,850.00

		it was docketed in state court and given new case number (2.0); various conferences with C. Murray and J. Wolfshohl regarding same (1.0); prepare notice of filing notice of removal to be filed in state court garnishment action (.8); telephone call with R. Chappel regarding filings in state court and removal (.6); review and provided initial comments to witness and exhibit list for hearing on motion to clarify/enforce dismissal order (.9); review research and case law provided by V. Driver regarding their position on corporate authority (.8); conference with C. Murray and J. Wolfshohl regarding same and extension of stay (.4); telephone conference with A. Catmull regarding corporate authority issues (.5)			
Service	06/25/2024	Other Contested Matters: • Call with J. Wolfshohl and C. Murray regarding operational expenses/budget issues and status of hearing on trustee's emergency motion to clarify (1.0); review various emails regarding same from team members (.2); various conferences with Vickie Driver regarding same and budget related issues (.5); work internally on hearing exhibits and testimony for trustee's emergency motion (1.5); conference call with M. Goott regarding impact of Trustee's motion to clarify and Texas's turnover order on pending adversary with EGS (.8); conference with C. Murray regarding same (.2); conference call with C. Murray and J. Martin regarding effect of Texas turnover order on an orderly winddown of FSS operations (.4); review J. Martin email regarding same (.1); extended work session with C. Murray on corporate authority research (1.3)	6.00	\$750.00	\$4,500.00
Service	06/25/2024	Case Administration: • Participate in call with C. Murray, J. Shulte, and B. Schleizer regarding various business issues relative to FSS and evaluation of options for liquidation of asset in chapter 7 (.5); conference with C. Murray regarding same (.5); various emails with V. Driver, C. Murray and J. Wolfshohl regarding invoices/critical expenses, including payroll, that need to be paid but Texas turnover order creates uncertainty (.4); telephone call with V. Driver regarding problems with credit card processor and holdbacks and history with other processors (.4); various emails and calls with V. Driver to confirm wire instructions to transfer funds from chapter 11 estate to chapter 7 estate accounts and conference with C. Murray regarding same (.5); review and respond and forward to C. Murray email from W. Cicack with unpaid invoices (.2); various conferences with V. Driver, S. Lemmon, and other parties' attorneys regarding use of cash for orderly winddown and possible stipulation and agreed order regarding same (1.2)	3.70	\$750.00	\$2,775.00
Service	06/25/2024	Other Contested Matters: Conference with C. Murray and J. Wolfshohl regarding garnishment proceeding in state court set with hearing for Wednesday despite	1.80	\$750.00	\$1,350.00

		removal (.5); various calls with R. Chappel regarding state court wanting update on status of removal (.6); email state court's case manager regarding same (.2); review clerk's response regarding processing timeline for things filed on Texas E-file and respond to same (.2); conference with C. Murray regarding same (.3)			
Service	06/26/2024	Fee/Employment Applications: Draft and revise application to employ Jones Murray LLP together with proposed order and supporting exhibits (1.3)	1.30	\$495.00	\$643.50
Service	06/26/2024	Other Contested Matters: Work session with C. Murray, E. Jones, and trustee team to discuss strategy and prepare for hearing on motion to clarify, removal issues, and framework for global resolution (2.0)	2.00	\$495.00	\$990.00
Service	06/26/2024	Asset Analysis and Recovery: Meeting with C. Murray and trustee team regarding framework for proposal to resolve disputes globally (1.2); telephone call with V. Driver regarding potential terms of global resolution (.6); revise and circulate agreed order and stipulation for internal review and comments (.5); various emails with S. Lemmon regarding framework for resolution (.2); various emails with J. Martin et. al. regarding same (.3) conference with counsel for Ct. families regarding same (.6)	3.30	\$750.00	\$2,475.00
Service	06/26/2024	Other Contested Matters: Review and respond to email from R. Chappel regarding status of removal, review WDTX docket regarding status of removed cases (.5)	0.50	\$750.00	\$375.00
Service	06/26/2024	Other Contested Matters: Continue to work on witness and exhibit list for hearing on motion to clarify and enforce dismissal order (.6)	0.60	\$750.00	\$450.00
Service	06/26/2024	Other Contested Matters: Review voice message from K. Jones to J. Wolfshohl and respond to team email with outline of issues (.2); obtain divorce decree and review same (1.1); review service information and lists in cases (.5)	1.70	\$750.00	\$1,275.00
Service	06/27/2024	Other Contested Matters: Review exhibits and pleadings to prepare for June 27 hearing on Trustee's motion to clarify and extend stay (0.5); observe June 27 hearing same (0.6)	1.10	\$495.00	\$544.50
Service	06/27/2024	Asset Analysis and Recovery: Various conferences with S. Lemmon regarding PQPR lien issue in connection with potential wind-down (.5), A. Catmull regarding pending transition issues (.4), W. Cicack regarding shipping invoices (.3), with B. Schleizer and J. Schulte regarding payroll (.2), and V. Driver regarding next steps in orderly wind down (.5)	1.90	\$750.00	\$1,425.00
Service	06/27/2024	Asset Analysis and Recovery: Prepare for hearing on Trustee's emergency motion to clarify and enforce dismissal order (2.5); represent Trustee at hearing on	3.40	\$750.00	\$2,550.00

		same (.6); meeting with C. Murray and trustee team after hearing regarding next steps (.3)			
Service	06/28/2024	Case Administration: Conference call with C. Murray and trustee team to discuss case strategy and identify issues and tasks (1.4); post-call debrief with E. Jones and C. Murray (0.3)	1.70	\$495.00	\$841.50
Service	06/28/2024	Fee/Employment Applications: Revise and add to draft application to employ Jones Murray, the proposed order, and supporting documents, to include terms of employment of Porter Hedges as co-counsel (1.8)	1.80	\$495.00	\$891.00
Service	06/28/2024	Case Administration: Weekly trustee team meeting with Porter Hedges and C. Murray regarding division of work and management of various pending matters (1.4)	1.40	\$750.00	\$1,050.00
Service	06/28/2024	Case Administration: Conference call with L. Butler regarding representation of landlord and prior credit card processor and various issues relating to claims and background of cases (.7)	0.70	\$750.00	\$525.00
Service	06/28/2024	Asset Analysis and Recovery: Conference call with K. Kimpler and C. Murray regarding potential pathway for global resolution and other case administration issues and pending motions relating to Connecticut families (1.0); work session with C. Murray regarding same (.4)	1.40	\$750.00	\$1,050.00
Service	06/28/2024	Asset Analysis and Recovery: Conference call with K. Kimpler and C. Murray regarding potential pathway for global resolution and other case administration issues and pending motions relating to Connecticut families (1.0); work session with C. Murray regarding same (.4); review various emails from W. Cicack regarding potential sale process (.3); work session with C. Murray regarding potential offer to purchase assets and conference with W. Cicack regarding same (.5); various emails and conferences with C. Murray and J. Wolfshohl regarding transition of information regarding potential claims and set up time to discuss same with counsel for UCC (.4)	2.60	\$750.00	\$1,950.00
Service	06/28/2024	Fee/Employment Applications: Conference with J. Wolfshohl regarding employment applications and interim compensation (.3)	0.30	\$750.00	\$225.00
Service	06/29/2024	Asset Analysis and Recovery: Conference with C. Murray regarding various open business issues and update regarding estate's business interests (.9); review K. Jones email forwarded from J. Wolfshohl and discuss same with C. Murray (.3)	1.20	\$750.00	\$900.00
Service	06/30/2024	Case Administration: Research rules, procedures, and standing regarding media attendance at 341 meetings (0.5)	0.50	\$495.00	\$247.50
Expense	07/03/2024	Postage/Copies: Postage/Copies - Mailout of JM	1.00	\$404.18	\$404.18

Invoice # 5 - 07/22/2024

Application to Employ	
Total	\$87,679.18

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
5	08/21/2024	\$87,679.18	\$0.00	\$87,679.18
Outstanding Balance				\$87,679.18
Total Amount Outstanding				\$87,679.18

Please make all amounts payable to: Jones Murray LLP

Please pay pursuant to Court Order

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
ALEXANDER E. JONES	§	Case No. 22-33553
	§	(Chapter 7)
Debtor.	§	

**SECOND MONTHLY FEE STATEMENT OF JONES MURRAY LLP AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR
ALLOWANCE OF COMPENSTION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM JULY 1, 2024 THROUGH JULY 31, 2024**

Name of Applicant:	Jones Murray LLP, as proposed bankruptcy counsel for Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	Order at Dkt. No. 794
Period for which Fees and Expenses are Incurred:	July 1, 2024 through and including June 31, 2024
Interim Fees Incurred:	\$74,039.50
Interim Payment of Fees Requested (80%):	\$59,231.60
Interim Expenses Incurred:	\$1,391.23
Total Fees and Expenses Due:	\$60,622.83

This is the Second Monthly Fee Statement.

Jones Murray LLP (“JM”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Second Monthly Fee Statement (the “Fee Statement”) for the period from July 1, 2024 through July 31, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [pending, motion filed at Docket No. 757] (the “Interim Compensation Order”).

JM requests compensation for professional services rendered in the amount of \$74,039.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,391.23 (the “Expenses”), for the period from July 1, 2024 through July 31, 2024. Eighty percent (80%) of the fees equals \$59,231.60 and one hundred percent (100%) of the Expenses equals \$1,391.23 for a total requested amount of \$60,622.83.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by JM attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. JM’s invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, JM respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$59,231.60 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$1,391.23 in the total amount of \$60,622.83.

Dated August 12, 2024.

Respectfully submitted,

JONES MURRAY LLP

/s/ Erin E. Jones

Erin E. Jones

Texas Bar No. 24032478

erin@jonesmurray.com

602 Sawyer St., Suite 400

Houston, TX 77007

Tel. (832) 529-1999

CO-COUNSEL FOR THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on August 12, 2024.

/s/ Erin E. Jones

Erin E. Jones

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	48.7	\$35,377.50
Assumption/Rejection of Contracts	.3	\$225.00
Case Administration	31.1	\$17,611.50
Claims Administration and Objections	3.7	\$2,698.50
Employment/Fee Application	23.2	\$11,686.00
Litigation/Other Contested Matters	8.1	\$5,616.00
Stay Relief	1.1	\$825.00
TOTAL	116.2	\$74,039.50

EXHIBIT 2

SUMMARY OF OUT OF POCKET EXPENSES

Expense Description	Cost
Legal Research Fees	\$508.90
Postage/Copies – Mailout	\$404.18
Travel Expenses	\$882.33
TOTAL EXPENSES	\$1,391.23

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY BILLING PROFESSIONALS

Professional	Hourly Rate	Total Hours
Erin E. Jones, <i>Partner</i>	\$750.00	91.1
Jacqueline Q. Chiba, <i>Associate</i>	\$495.00	17.7
Joshua Sosa, <i>Paralegal</i>	\$95.00	7.4
TOTAL		116.2

EXHIBIT 4**Jones Murray LLP**

602 Sawyer St, Ste 400
Houston, TX 77007

INVOICE

Invoice # 9
Date: 08/12/2024
Due On: 09/11/2024

Christopher Murray, Chapter 7 Trustee
602 Sawyer Street, Suite 400
Houston, TX 77007

00040-Christopher Murray, Chapter 7 Trustee**In re Alexander E. Jones**

Type	Date	Notes	Quantity	Rate	Total
Service	07/01/2024	Fee/Employment Applications: Revise application to employ general bankruptcy co-counsel and provide final draft to C. Murray and E. Jones for review (0.8)	0.80	\$495.00	\$396.00
Service	07/01/2024	Case Administration: Conference call with counsel for the committee of unsecured creditors, E. Jones, C. Murray, and J. Wolfshohl to discuss documents and information available from prior investigation (0.5); post-call debrief and strategy meeting with E. Jones and C. Murray (0.8)	1.30	\$495.00	\$643.50
Service	07/01/2024	Case Administration: Conference with J. Chiba regarding media presence at 341 meeting (.2); begin to review schedules and statements for 341 meeting (.9); conference with C. Murray regarding same (.2)	1.30	\$750.00	\$975.00
Service	07/01/2024	Asset Analysis and Recovery: Conference with C. Murray regarding discussion with J. Martin regarding distribution issues and wind down process (.2); conference with C. Murray regarding discussions with A. Moshenberg regarding Texas families' position on various wind down issues (.3); conference call with A. Moshenberg and C. Murray and conference with C. Murray regarding issues raised during call (.5)	1.00	\$750.00	\$750.00
Service	07/01/2024	Asset Analysis and Recovery: Conference call with UCC counsel and trustee team regarding scope of investigation, materials in possession, protective orders and subpoena (.5); conference with Trustee team regarding same (.8)	1.30	\$750.00	\$975.00
Service	07/02/2024	Meeting of Creditors: Review conversion schedules and SOFA to prepare for continued 341 meeting (0.8); observe continued 341 meeting (0.2)	1.00	\$495.00	\$495.00
Service	07/02/2024	Case Administration: Prepare and represent trustee at 341 meeting including preparation with trustee before	1.60	\$750.00	\$1,200.00

		meeting (1.2); post meeting conference with trustee regarding status of various pending issues and priority matters (.4)			
Service	07/02/2024	Case Administration: Telephone conference with V. Driver regarding securing FSS facility and continuing need for security versus cutting back and contracts relating to same, personnel issues, continued access to FSS facility, operational issues regarding autopay and cash flow of FSS, confirm and coordinate meeting on site at FSS to evaluate asset, value of gym equipment and background regarding same, location and value of RV and armored vehicle, value of production equipment, insurance coverages, facility lease people touring facility, and proposal received regarding purchase of assets and related transactions FSS (1.1); extended conference with C. Murray regarding each of the above to evaluate potential action items in relation to administration of assets (1.0)	2.10	\$750.00	\$1,575.00
Service	07/03/2024	Asset Analysis and Recovery: Conference call with E. Jones, C. Murray, M. Dearman, K. Starling, J. Stevens to discuss case strategy, status of on-going concerns, and potential sale process (0.9); post-call strategy meeting and debrief with C. Murray and E. Jones to discuss exemptions and the potential sale of certain assets (0.3)	1.20	\$495.00	\$594.00
Service	07/03/2024	Case Administration: Identify and review statutory deadlines relating to exemptions, 727, 523, 546, and 365 (0.3); research application of those deadlines to case converted to chapter 7 (2.2); draft and send detailed email summarizing issues and research regarding same to C. Murray and E. Jones (0.3)	2.80	\$495.00	\$1,386.00
Service	07/03/2024	Asset Analysis and Recovery: Conduct legal research to draft memo analyzing applicability of wage exemptions under Texas law (2.5)	2.50	\$495.00	\$1,237.50
Service	07/03/2024	Asset Analysis and Recovery: Weekly trustee team call regarding workflows and ongoing issues relating to assets and investigations (1.0); legal research regarding use of certain IP (2.2); extensive review of all schedules, sofas filed to date in both FSS and Jones cases and Form 1 in Jones case post-conversion and begin to research ownership issues and valuation issues (5.3); continue to review plan and disclosure statements and pleadings relating to same for background on causes of action and potential claims of the estate (2.1); conference with J. Chiba regarding "current wage" issue and email to V. Driver and C. Stephenson regarding inclusion on schedules (.5); review M. Dearman email regarding wind down issues for FSS (.2); review A. Catmull email regarding exemptions and discuss same with C. Murray (.1); email to V. Driver and C. Stephenson requesting premarital agreement and review same (.9); forward	12.60	\$750.00	\$9,450.00

		same to trustee team and conference with C. Murray regarding same (.3)			
Service	07/03/2024	Assumption/Rejection of Leases and Contracts: Conference with J. Chiba regarding all deadlines including 365 deadlines (.3)	0.30	\$750.00	\$225.00
Service	07/03/2024	Fee/Employment Applications: Conference with J. Chiba regarding previous fee orders and applications and notices of fees to create summary or chart for use in review of pending fee applications (.3); finalize and file JM employment application (.5)	0.80	\$750.00	\$600.00
Service	07/03/2024	Claims Administration and Objections: Conference with JC and AP regarding claim analysis in AEJ v FSS cases (.4); review notice of status in adversary and review docket regarding same 24-01035 and 01034 (.4)	0.80	\$750.00	\$600.00
Service	07/09/2024	Asset Analysis and Recovery: Conference call with C. Murray regarding status of issues to be discussed with counsel for PQPR and potential purchaser of assets (.4)	0.40	\$750.00	\$300.00
Service	07/09/2024	Asset Analysis and Recovery: Conference call with C. Murray regarding status of issues to be discussed with counsel for PQPR (.4), proposal of potential purchaser of assets in light of anticipated proposal and sale concept generally for other types of prospective buyers (.9), fee applications (.3), operational issues (.2), setting up calls with counsel for Texas and Connecticut families to further explore views on wind down issues (.2), set meetings with V. Driver, B. Schleizer, K. Kimpler, Texas counsel, and prospective buyer counsel (.5)	2.50	\$750.00	\$1,875.00
Service	07/10/2024	Asset Analysis and Recovery: Telephone conference with C. Murray and J. Wolfshohl regarding strategy issues and discussions with various constituents about wind down (1.0); telephone conference with K. Kimpler and team, C. Murray and trustee team regarding major pending issues in cases and background on same (1.2); conference call with C. Murray regarding meeting with counsel for Texas families (.5); conference with R. Chappel regarding status of litigation (.2)	3.50	\$750.00	\$2,625.00
Service	07/10/2024	Asset Analysis and Recovery: Conference with V. Driver regarding extensions and status of other major case issues including sale and operations (.7); conference with C. Murray and J. Wolfshohl regarding same (.6)	1.30	\$750.00	\$975.00
Service	07/11/2024	Case Administration: Conference call with Porter Hedges to discuss case strategy and status of issues relating to claims, fees, and exemptions (0.8); post-call debrief and strategy meeting with E. Jones and C. Murray (0.2)	1.00	\$495.00	\$495.00

Service	07/11/2024	Fee/Employment Objections: Draft and revise stipulation and agreed order extending deadline to respond to Crowe & Dunlevy's final fee application (1.1)	1.10	\$495.00	\$544.50
Service	07/11/2024	Claims Administration and Objections: Draft and revise stipulation and agreed order to extend deadline to respond to Debtor's objection to Connecticut Plaintiffs' claim (0.3)	0.30	\$495.00	\$148.50
Service	07/11/2024	Asset Analysis and Recovery: Draft and revise stipulation and agreed order to extend deadline to object to the Debtor's claimed exemptions (0.2)	0.20	\$495.00	\$99.00
Service	07/11/2024	Fee/Employment Applications: AP: Review relevant applications and begin spreadsheet analysis of final fee applications of chapter 11 professionals (1.2)	1.20	\$95.00	\$114.00
Expense	07/11/2024	Reimbursable expenses: 2024 Q2 PACER Charges	1.00	\$508.90	\$508.90
Service	07/11/2024	Case Administration: Prepare and participate in weekly trustee team meeting regarding workflows (1.0); conference with C. Murray regarding status of various pending projects and initial findings (.5)	1.50	\$750.00	\$1,125.00
Service	07/11/2024	Asset Analysis and Recovery: Conference with C. Murray and counsel for prospective purchaser of assets regarding potential proposal (.4)	0.40	\$750.00	\$300.00
Service	07/11/2024	Asset Analysis and Recovery: Conference with V. Driver, A. Jones, B. Schleizer regarding various administration issues (.4); conference with C. Murray regarding same and next steps (.4)	0.80	\$750.00	\$600.00
Service	07/11/2024	Fee/Employment Applications: Review and respond to email from L. Lieberman regarding status of extension on deadline to respond to fee applications (.1)	0.10	\$750.00	\$75.00
Service	07/11/2024	Fee/Employment Applications: Draft agreed order and stipulation regarding extensions of time to respond to fee applications and circulate for comments (.5)	0.50	\$750.00	\$375.00
Service	07/11/2024	Claims Administration and Objections: Draft agreed order and stipulation regarding extensions of time to respond to claim objections filed pre-conversion (.6); review comments from V. Robinson and revise (.2); circulate to V. Driver and C. Stephenson for review (.2)	1.00	\$750.00	\$750.00
Service	07/11/2024	Other Contested Matters: Draft agreed order and stipulation regarding extension of time to object to exemptions and various conferences with J. Chiba regarding same (.5)	0.50	\$750.00	\$375.00
Service	07/11/2024	Case Administration: Extended conference with V. Driver regarding pending objections to claims, exemption issues, sale issues, and fee applications (.8)	0.80	\$750.00	\$600.00
Service	07/12/2024	Fee/Employment Applications: AP: Continue to review relevant applications and related exhibits and update	2.00	\$95.00	\$190.00

		spreadsheet analysis of final fee applications of chapter 11 professionals (2.0)			
Service	07/14/2024	Case Administration: Extended conference call with C. Murray in preparation for call with US Trustee and legal team and other pending case administration issues (1.3)	1.30	\$750.00	\$975.00
Service	07/15/2024	Other Contested Matters: Call with N. Patties regarding ADA lawsuit in NY District court related to FSS (0.2); call with E. Jones to discuss same (0.1)	0.30	\$495.00	\$148.50
Service	07/15/2024	Case Administration: Call with C. Murray regarding agenda for call with US Trustee's Office (.6); call with US Trustee K. Epstein and counsel (.5); call with J. Wolfshohl and C. Murray regarding issues raised during call with US Trustee regarding administration of estate (.6)	1.60	\$750.00	\$1,200.00
Service	07/15/2024	Other Contested Matters: Call with J. Chiba regarding discussion with N. Pattis regarding pending district court litigation (.2); telephone conference with N. Pattis regarding status of district court litigation and need to file status report (.6); conference with C. Murray regarding same (.1)	0.90	\$750.00	\$675.00
Service	07/15/2024	Fee/Employment Applications: Various emails with V. Driver and C. Stephenson regarding stipulation on extension for responding to fee application and pending claim objections and finalize same for filing (.4); various emails with counsel for Connecticut families regarding same (.3); various emails with counsel for Texas families regarding same (.2); finalize other stipulations and agreed orders on extensions for filing (.5)	1.40	\$750.00	\$1,050.00
Service	07/16/2024	Fee/Employment Applications: Draft stipulations to extend deadline for responses for the fee applications filed by D.R. Payne & Associates, MDJW, Blackbriar, and Jordan & Ortiz, P.C. (0.7)	0.70	\$495.00	\$346.50
Service	07/16/2024	Asset Analysis and Recovery: Telephone conference with C. Murray regarding issues discussed with UST regarding case administration (.6); review various emails with counsel for Texas for meeting (.1); conference with C. Murray regarding same and other sale related issues relating to abandonment of assets (.8)	1.50	\$750.00	\$1,125.00
Service	07/16/2024	Relief From Stay Proceedings: Review docket and schedules regarding Chevy Tahoe and pending motion to lift stay (.7); prepare for and represent trustee at hearing on motion to lift stay (.3); conference with C. Murray regarding status after hearing and order to be entered (.1)	1.10	\$750.00	\$825.00
Service	07/16/2024	Fee/Employment Applications: Continued conferences with V. Driver, S. Jordan, Blackbriar, MDJW regarding	4.20	\$750.00	\$3,150.00

		extensions of time to review fee applications, review of need for extensions and obtaining agreements to sign with permission (3.0); conference with various parties regarding pending applications for DR Payne, Reynal, Teneo and role prior to conversion, conference with C. Murray regarding same (.8); various conferences with V. Robinson regarding status of extensions (.3); telephone conference with V. Robinson regarding fee applications in Jones case (.1)			
Service	07/16/2024	Claims Administration and Objections: Conference with C. Murray and S. Lemmon regarding discussion needed on various lien issues (.2); review live pleadings in adversary (1.4)	1.60	\$750.00	\$1,200.00
Service	07/17/2024	Fee/Employment Applications: AP: Continue to review relevant applications and related exhibits, identify any errors and reconciliations, and update spreadsheet analysis of final fee applications of chapter 11 professionals (2.2)	2.20	\$95.00	\$209.00
Service	07/17/2024	Case Administration: Travel to Austin for rescheduled meeting at FSS facility (3.5)	3.50	\$750.00	\$2,625.00
Service	07/17/2024	Case Administration: Review and respond to A. Catmull email regarding withdrawal as counsel and conference with C. Murray regarding same (.2)	0.20	\$750.00	\$150.00
Service	07/17/2024	Asset Analysis and Recovery: Extended conference with C. Murray regarding agenda for meeting at FSS facility to prepare for same (2.0)	2.00	\$750.00	\$1,500.00
Service	07/17/2024	Asset Analysis and Recovery: Various conferences with J. Wolfshohl and C. Murray regarding discussions with counsel for Texas families regarding wind down issues (.3); review and respond to email from Tx counsel regarding same (.1)	0.40	\$750.00	\$300.00
Service	07/17/2024	Asset Analysis and Recovery: Various conferences with C. Murray regarding PQPR lien issues and status of discussion with PQPR counsel regarding same (.5)	0.50	\$750.00	\$375.00
Service	07/17/2024	Other Contested Matters: Conference with V. Driver regarding exemption issues (.2); review schedule of claimed exemptions in conversion schedules and schedule A/B (.4); conference with C. Murray regarding various claimed exemptions and issues relating to same (.5)	1.10	\$750.00	\$825.00
Expense	07/17/2024	Travel: EEJ Airfare to Austin (billed at half)	1.00	\$368.99	\$368.99
Expense	07/17/2024	Travel: EEJ Lodging - Austin	1.00	\$330.42	\$330.42
Expense	07/17/2024	Travel: EEJ - Parking at Hotel	1.00	\$67.12	\$67.12
Expense	07/17/2024	Travel: EEJ - Travel Meal	1.00	\$29.62	\$29.62
Service	07/18/2024	Case Administration: Conference call with legal team	0.90	\$495.00	\$445.50

		for the trustee to discuss case status, pending items and issues, and strategy (0.9)			
Service	07/18/2024	Fee/Employment Applications: AP: Continue to review relevant applications and related exhibits, validate computations, identify any errors and reconciliations, and update spreadsheet analysis of final fee applications of chapter 11 professionals (2.0)	2.00	\$95.00	\$190.00
Service	07/18/2024	Asset Analysis and Recovery: Prepare for (1.3) and represent trustee at meeting at FSS facility with C. Murray, V. Driver, C. Stephenson, B. Schleizer, auctioneer (2.5); meeting with S. Lemmon to discuss PQPR claims and lien issues and to see real property held by family trusts (2.0); conference call with C. Murray and J. Wolfshohl regarding same (.5)	6.30	\$750.00	\$4,725.00
Service	07/18/2024	Other Contested Matters: Review legal research and cases relating to claimed exemption for "current wages" (1.2)	1.20	\$750.00	\$900.00
Service	07/18/2024	Case Administration: Return travel to Houston, included working time for weekly team meeting with Trustee team to discuss workflows and calls to counsel for various key constituents (3.5)	3.50	\$750.00	\$2,625.00
Expense	07/18/2024	Travel: EEJ - Travel Meal with CRM (Breakfast)	1.00	\$54.06	\$54.06
Expense	07/18/2024	Travel: EEJ - Travel Meal with CRM (Lunch)	1.00	\$32.12	\$32.12
Service	07/19/2024	Other Contested Matters: Prepare with C. Murray for hearing on trustee's motion to clarify and enforce dismissal order (.6); telephone call with V. Driver and C. Stephenson regarding conversion schedules, bank accounts, and hearing on trustee's motion to clarify and enforce dismissal order (.6)	1.20	\$750.00	\$900.00
Service	07/19/2024	Asset Analysis and Recovery: Meeting with counsel for Texas families, J. Wolfshohl, and Trustee at PH offices (2.2); conference with J. Wolfshohl and C. Murray regarding issues raised at meeting (.3)	2.50	\$750.00	\$1,875.00
Service	07/20/2024	Asset Analysis and Recovery: Conference call with C. Murray regarding call with counsel for Connecticut families and considerations/next steps regarding same (.7)	0.70	\$750.00	\$525.00
Service	07/20/2024	Asset Analysis and Recovery: Review message from J. Martin regarding remand in removed case and J. Wolfshohl regarding same, respond to same (.2)	0.20	\$750.00	\$150.00
Service	07/22/2024	Asset Disposition: Review emails from T. Holman regarding potential purchase of certain assets (0.3); phone call with T. Holman to discuss proposed sale of same (0.2); follow up correspondence to T. Holman confirming discussion (0.1)	0.60	\$495.00	\$297.00
Service	07/22/2024	Fee/Employment Applications: Review billing and	2.50	\$750.00	\$1,875.00

Invoice # 9 - 08/12/2024

		prepare first interim notices of fees and conference with C. Murray regarding same (2.5)			
Service	07/24/2024	Asset Analysis and Recovery: Various conferences with C. Murray regarding status of discussions with counsel for prospective buyers regarding terms of potential proposal and various creditor groups (.6)	0.60	\$750.00	\$450.00
Service	07/24/2024	Other Contested Matters: Review various emails with J. Wolfshohl and J. Martin regarding motion to remand, upcoming hearing in removed matters, and agreed motion for continuance or extension of deadlines (.5); various conferences with C. Murray regarding same (.2); various conferences with J. Wolfshohl regarding same (.2)	0.90	\$750.00	\$675.00
Service	07/25/2024	Other Contested Matters: Review and determine procedures governing appearances and participation in the WDTX regarding the remand/removal of state court litigation issue (0.3); status and strategy meeting with legal team for the trustee regarding same and to discuss other pending issues in the case (0.6)	0.90	\$495.00	\$445.50
Service	07/25/2024	Fee/Employment Applications: Draft stipulation to extend deadline to respond to fee application of OWPLLC and send to OWPLLC for review (0.4); draft stipulation regarding extension of deadline to respond to fee application of L. Freeman and provide to M. Dearman for review/revisions (0.2)	0.60	\$495.00	\$297.00
Service	07/25/2024	Other Contested Matters: Review procedures in rules regarding appearances in the WDTX for the status hearing on the removal action of a debtor-related state court action (0.5); provide recommendation to C. Murray regarding same (0.1)	0.60	\$495.00	\$297.00
Service	07/25/2024	Other Contested Matters: Various messages with J. Wolfshohl regarding hearing in removed matters in Austin (.3); conference with C. Murray regarding same and next steps (.2)	0.50	\$750.00	\$375.00
Service	07/25/2024	Asset Analysis and Recovery: Extended conference with C. Murray regarding proposal from Connecticut families, sale issues, distribution issues, status of potential sale proposals to discuss next steps (1.2)	1.20	\$750.00	\$900.00
Service	07/25/2024	Fee/Employment Applications: Continue to review fee application issues and conference with C. Murray regarding same (.5); various emails regarding extension of deadline to respond to same for various applicants (.3)	0.80	\$750.00	\$600.00
Service	07/25/2024	Asset Analysis and Recovery: Review subpoena to UCC, disclosure statement with respect to potential causes of action (.6); conference with C. Murray regarding same (.2)	0.80	\$750.00	\$600.00

Invoice # 9 - 08/12/2024

Service	07/26/2024	Fee/Employment Applications: Review and consider correspondence from Porter Hedges team regarding status of stipulations to extend deadline and provide commentary in response (0.2)	0.20	\$495.00	\$99.00
Service	07/26/2024	Fee/Employment Applications: Various discussions with C. Murray and trustee team regarding extension deadlines on certain fee applications and status of stipulations and agreements with same, review emails regarding same and status (.7); send information to M. Dearman with explanation of MDJW fee applications in both cases (.3)	1.00	\$750.00	\$750.00
Service	07/29/2024	Case Administration: Draft and revise stipulation and agreed order to extend the deadline to object to Debtor's exemptions and circulate to C. Murray for review (0.4)	0.40	\$495.00	\$198.00
Service	07/29/2024	Fee/Employment Applications: Various emails and discussions regarding FSS and Jones professionals' fee applications and pending deadlines of extensions to respond to same (.7); review stipulation and agreed orders regarding same (.4)	1.10	\$750.00	\$825.00
Service	07/30/2024	Asset Analysis and Recovery: Review various emails regarding discussions with various parties regarding a potential global resolution of disputes in connection with wind down of FSS and claims (.5); extended conference with C. Murray regarding status of discussions with Texas and Connecticut families, Jones, PQPR, and prospective buyers (.6); conference call with J. Wolfshohl and C. Murray regarding same (.3); call with counsel for Connecticut families regarding status of wind down and sale issues (.5)	0.80	\$750.00	\$600.00
Service	07/31/2024	Case Administration: Contact Debtor's counsel regarding information for Debtor's real property (0.1); confer with E. Jones regarding strategy for evaluating the Debtor's real property (0.2)	0.30	\$495.00	\$148.50
Service	07/31/2024	Asset Analysis and Recovery: Review emails regarding sealed addresses and research regarding value, lien, and ownership issues (2.5); conference with J. Chiba regarding same (.4)	2.90	\$750.00	\$2,175.00
Service	07/31/2024	Case Administration: Conference call with C. Murray and J. Wolfshohl regarding workflow and potential sale (1.1); review various emails regarding anticipated proposal from prospective buyer (.3); telephone conference with potential auctioneer to be retained for sale of assets with C. Murray (.8); telephone call with C. Murray and counsel for prospective buyer regarding anticipated proposal (.4); various conferences with C. Murray regarding feedback from counsel for Tx families and discuss concepts for sale (.4)	1.00	\$750.00	\$750.00
				Total	\$75,430.73

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES Debtor.	§ § § § §	Case No. 22-33553 (Chapter 7)
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**THIRD MONTHLY FEE STATEMENT OF JONES MURRAY LLP AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR
ALLOWANCE OF COMPENSTION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant:	Jones Murray LLP, as proposed bankruptcy counsel for Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	Order at Dkt. No. 794
Period for which Fees and Expenses are Incurred:	August 1, 2024 through and including August 31, 2024
Interim Fees Incurred:	\$76,454.50
Interim Payment of Fees Requested (80%):	\$61,163.60
Interim Expenses Incurred:	\$0.00
Total Fees and Expenses Due:	\$61,163.60

This is the Third Monthly Fee Statement.

Jones Murray LLP (“JM”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Third Monthly Fee Statement (the “Fee Statement”) for the period from August 1, 2024 through August 31, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [pending, motion filed at Docket No. 757] (the “Interim Compensation Order”).

JM requests compensation for professional services rendered in the amount of \$76,454.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$0.00 (the “Expenses”), for the period from August 1, 2024 through August 31, 2024. Eighty percent (80%) of the fees equals \$61,163.60 and one hundred percent (100%) of the Expenses equals \$0.00 for a total requested amount of \$61,163.60.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by JM attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. JM’s invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, JM respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$61,163.60 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$0.00 for a total amount of \$61,163.60.

Dated September 10, 2024.

Respectfully submitted,

JONES MURRAY LLP

/s/ Erin E. Jones

Erin E. Jones

Texas Bar No. 24032478

erin@jonesmurray.com

602 Sawyer St., Suite 400

Houston, TX 77007

Tel. (832) 529-1999

CO-COUNSEL FOR THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on September 10, 2024.

/s/ Erin E. Jones

Erin E. Jones

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	100	\$62,633.50
Assumption/Rejection of Contracts	4	\$2,556.50
Case Administration	2.1	\$1,039.50
Claims Administration and Objections	9.1	\$6,748.50
Employment/Fee Application	3.5	\$2,625.00
Litigation/Other Contested Matters	1.7	\$841.50
TOTAL	120.4	\$76,454.50

EXHIBIT 2

SUMMARY OF OUT OF POCKET EXPENSES

Expense Description	Cost
TOTAL EXPENSES	\$0.00

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY BILLING PROFESSIONALS

Professional	Hourly Rate	Total Hours
Erin E. Jones, <i>Partner</i>	\$750.00	76.3
Jacqueline Q. Chiba, <i>Associate</i>	\$495.00	37.6
Apollo Pham, <i>Paralegal</i>	\$95.00	6.5
TOTAL		120.4

EXHIBIT 4

Jones Murray LLP

602 Sawyer St, Ste 400
Houston, TX 77007

INVOICE

Invoice # 10
Date: 09/10/2024
Due On: 10/10/2024

Christopher Murray, Chapter 7 Trustee
602 Sawyer Street, Suite 400
Houston, TX 77007

00040-Christopher Murray, Chapter 7 Trustee**In re Alexander E. Jones**

Type	Date	Notes	Quantity	Rate	Total
Service	08/01/2024	Claims Administration and Objections: Review and confirm the deadlines set forth in the executed stipulations relating to objections and responses to pleadings pending in the case and calendar (0.3)	0.30	\$495.00	\$148.50
Service	08/01/2024	Case Administration: Conference call between Trustee's legal team to discuss case strategy and pending issues (1.2)	1.20	\$495.00	\$594.00
Service	08/01/2024	Case Administration: Strategy meeting with E. Jones and C. Murray regarding case status, exemptions, and other pending matters in the case (0.4)	0.40	\$495.00	\$198.00
Service	08/01/2024	Asset Disposition: Call with Trustee legal team on various open items/projects (1.2); call with A. Jones legal team and conference with C. Murray regarding same (.5); conference with C. Murray regarding potential buyer for IP as a standalone purchase (.3)	2.00	\$750.00	\$1,500.00
Service	08/02/2024	Asset Disposition: Conference with C. Murray regarding interested parties for a potential sales process (0.4)	0.40	\$495.00	\$198.00
Service	08/05/2024	Asset Analysis and Recovery: Conference call between members of trustee's legal team to discuss sale process for assets and strategy regarding pending fee application of professionals (0.8); post call debrief with E. Jones regarding same (0.3)	1.10	\$495.00	\$544.50
Service	08/05/2024	Assumption/Rejection of Leases and Contracts: Review 365(d)(1) deadlines and schedules regarding same (.6); conference with J. Wolfshohl regarding same (.3); conference with J. Chiba regarding same (.3)	1.20	\$750.00	\$900.00
Service	08/05/2024	Claims Administration and Objections: Call with J. Wolfshohl, M. Dearman, J. Chiba and C. Murray regarding FSS fees and Jones Fees and pending fee applications and orders (.8); call to A. Catmull regarding	4.80	\$750.00	\$3,600.00

Invoice # 10 - 09/10/2024

		same (.1); review fee applications in detail and analysis of previous payments and update chart and forward to C. Murray and team (3.4); review docket for previous proffers/representations regarding fee amounts (.5)			
Service	08/05/2024	Asset Analysis and Recovery: Conference with C. Murray regarding sale process/auction concepts and review various expressions of interest (1.3)	1.30	\$750.00	\$975.00
Service	08/05/2024	Asset Analysis and Recovery: Review ESG adversary docket and evaluate dispute between parties (1.5); review background materials (.4); telephone call with J. Patterson regarding same (1.2); conference with J. Wolfshohl regarding same (.4)	3.50	\$750.00	\$2,625.00
Service	08/05/2024	Asset Analysis and Recovery: Review chapter 11 dismissal and authority issues and research regarding same (4.2)	4.20	\$750.00	\$3,150.00
Service	08/06/2024	Assumption/Rejection of Leases and Contracts: Draft motion to extend 365(d)(1) deadline and proposed order (1.5)	1.50	\$495.00	\$742.50
Service	08/06/2024	Assumption/Rejection of Leases and Contracts: Confer with E. Jones regarding 365(d)(1) deadline (0.2)	0.20	\$495.00	\$99.00
Service	08/06/2024	Asset Analysis and Recovery: Review correspondence from T. Holman regarding Debtor's assets listed in schedules (0.1); review Debtor's pre-conversion schedules and post conversion schedules to prepare correspondence to Debtor's counsel regarding same (0.5); review response from Debtor's counsel and respond to T. Holman (0.1)	0.70	\$495.00	\$346.50
Service	08/06/2024	Asset Analysis and Recovery: Locate and review public property records related to real property owned by the Debtor or associated entities (2.0); conduct legal research into ownership of real property by trusts under Texas law to consider applicability of a homestead exemption (3.7); draft detailed summary of findings and analysis and provide to E. Jones for consideration (.9)	6.60	\$495.00	\$3,267.00
Service	08/06/2024	Claims Administration and Objections: Extended conference with A. Catmull regarding pending fees for FSS professionals and issues with distribution (.7); conference with C. Murray regarding same (.2); review reynal order regarding current balance (.2); extended conference call with M. Haselden regarding case background and fees (.9)	2.00	\$750.00	\$1,500.00
Service	08/06/2024	Assumption/Rejection of Leases and Contracts: Conference with J. Wolfshohl regarding executory contracts, status of various ongoing projects and sale concepts (.5); conference with J. Chiba regarding same and motion to extended 365 deadlines (.3); conference with C. Murray regarding same (.3)	1.10	\$750.00	\$825.00

Invoice # 10 - 09/10/2024

Service	08/06/2024	Asset Analysis and Recovery: Conference with J. Chiba regarding exemption issues to evaluate (.5); conference with C. Murray regarding same (.2)	0.70	\$750.00	\$525.00
Service	08/06/2024	Asset Analysis and Recovery: Conference with E. Jones regarding exemption issues to evaluate (.5)	0.50	\$495.00	\$247.50
Service	08/07/2024	Asset Analysis and Recovery: Conference with C. Murray regarding fee issues and update regarding discussions with various parties on sale concepts (.8)	0.80	\$750.00	\$600.00
Service	08/08/2024	Other Contested Matters: Strategy meeting with members of Trustee's legal team regarding sale process, negotiations, interested parties, and the removal/remand of state court litigation (1.2)	1.20	\$495.00	\$594.00
Service	08/08/2024	Asset Analysis and Recovery: Conference with C. Murray regarding sale issues/structure and review potential concepts/strategies to maximize value in sale process (.5)	0.50	\$750.00	\$375.00
Service	08/08/2024	Asset Analysis and Recovery: Participate in weekly Trustee legal team call and strategy session to discuss pending open projects (1.2); conference with C. Murray and J. Wolfshohl regarding potential buyer in a stalking horse bid situation (.5)	1.70	\$750.00	\$1,275.00
Service	08/12/2024	Fee/Employment Applications: Review PH 2nd Interim Monthly Fee Statement and conference with C. Murray regarding same and email to J. Wolfshohl regarding same (.5); prepare JM 2nd Interim Monthly Fee Statement and circulate for review and finalize same for filing (2.0)	2.50	\$750.00	\$1,875.00
Service	08/12/2024	Asset Analysis and Recovery: Review various emails regarding NDA for prospective purchasers / sale process and review draft NDA (.4); review V. Driver response to draft NDA and discuss with C. Murray and various responses to same (.3)	0.70	\$750.00	\$525.00
Service	08/12/2024	Asset Analysis and Recovery: Review email from W. Cicack requesting expense information for past 3 months and will agree to sign NDA and C. Murray response to same (.1); review email regarding potential new terms for proposal to purchase assets (.1)	0.20	\$750.00	\$150.00
Service	08/12/2024	Asset Analysis and Recovery: Conference with C. Murray regarding update on sale discussion with auctioneer and other interested parties (.5)	0.50	\$750.00	\$375.00
Service	08/12/2024	Asset Analysis and Recovery: Review email regarding AXOS bank account and email C. Murray regarding same (.1)	0.10	\$750.00	\$75.00
Service	08/12/2024	Asset Analysis and Recovery: Review emails with C. Murray, M. Dearman and J. Wolfshohl regarding sale process and various potential bidders/auction process	0.20	\$750.00	\$150.00

Invoice # 10 - 09/10/2024

(2)					
Service	08/12/2024	Asset Analysis and Recovery: Review various emails from K. Starling and begin process to set up and review UCC production (.6)	0.60	\$750.00	\$450.00
Service	08/13/2024	Asset Analysis and Recovery: Review correspondences from potential interested parties to create potential buyers list as part of sale process to consider as part of development of sale process (.9)	0.90	\$495.00	\$445.50
Service	08/15/2024	Other Contested Matters: Strategy meeting with members of Trustee's legal team to address pending legal issues and disputes related to the sale of Debtor's assets and recovery of other assets (0.5)	0.50	\$495.00	\$247.50
Service	08/15/2024	Research debtor's properties and associated trusts to find relevant deeds or liens (2.9), draft memorandum summarizing results of research (1.7)	4.60	\$95.00	\$437.00
Service	08/15/2024	Asset Analysis and Recovery: Participate in weekly trustee legal team call (.6); prepare for same (.3); conference with C. Murray regarding sale and auction issues (.5)	1.40	\$750.00	\$1,050.00
Service	08/16/2024	Asset Analysis and Recovery: Call V. Driver regarding various open issues including upcoming deadlines (.2)	0.20	\$750.00	\$150.00
Service	08/16/2024	Asset Analysis and Recovery: Review and respond to W. Cicack email regarding ESG issues and conference with C. Murray regarding same (.2)	0.20	\$750.00	\$150.00
Service	08/16/2024	Asset Analysis and Recovery: Review draft sale motion and provide comments to same (1.2); conference with C. Murray regarding same (.3)	1.50	\$750.00	\$1,125.00
Service	08/19/2024	Asset Analysis and Recovery: Call with J. Wolfshohl, C. Murray and M. Dearborn regarding sale process and review revisions relating to same and discuss same with C. Murray (2.0)	2.00	\$750.00	\$1,500.00
Service	08/19/2024	Asset Analysis and Recovery: Call with CT families' counsel, C. Murray, JW and MD - re sale, fees, and general status update (.5); conference with C. Murray re same (.4)	0.90	\$750.00	\$675.00
Service	08/19/2024	Asset Analysis and Recovery: Call with V. Driver regarding fee issues, sale issues, pending litigation with Texas claimant and lift stay (1.2)	1.20	\$750.00	\$900.00
Service	08/19/2024	Fee/Employment Applications: Various messages with V. Driver regarding order on fees and review of draft order and discuss same with C. Murray (1.0)	1.00	\$750.00	\$750.00
Service	08/20/2024	Asset Analysis and Recovery: Conference with J. Patterson regarding EGS claims and reporting issues (1.0); conference with C. Murray regarding same (.5)	1.50	\$750.00	\$1,125.00

Invoice # 10 - 09/10/2024

Service	08/21/2024	Asset Analysis and Recovery: Strategy meeting with E. Jones regarding investigation of trust held assets and evaluation of Debtor's exemptions (0.7); conduct initial legal research regarding treatment of trusts in bankruptcy and application of exemptions (3.8); begin review of prior disclosures, investigative reports, and other records related to Debtor's assets and claimed exemptions (3.0)	7.50	\$495.00	\$3,712.50
Service	08/21/2024	Asset Analysis and Recovery: Review redraft of sale motion, proposed order and Tranzon employ application and provide comments (1.1); conference with C. Murray regarding issues relating to same (.5); conference with J. Chiba regarding exemptions (.7); review various documents and prior analysis and disclosure relating to exemptions and property transfers (3.2)	5.50	\$750.00	\$4,125.00
Service	08/22/2024	Asset Analysis and Recovery: Finish review of disclosures and prior investigative reports relating to Debtor's assets (1.6); research and review property records and other legal documents relating to Debtor's trusts and assets (3.4); confer with E. Jones regarding same (0.1); review motion to employ auctioneer and proposed sale of FSS assets (0.5); conduct legal research regarding trust structures and rights of beneficiaries, settlors, and/or trustees (1.5)	7.10	\$495.00	\$3,514.50
Service	08/22/2024	Prepare relevant filings for review in connection with analysis of exemptions (1.9)	1.90	\$95.00	\$180.50
Service	08/22/2024	Asset Analysis and Recovery: Conference with J. Chiba regarding research on various exemption issues (.5); review W. Cicack email regarding sale issues and conference with C. Murray regarding same (.3)	0.80	\$750.00	\$600.00
Service	08/22/2024	Asset Analysis and Recovery: Review materials and research on homestead exemption (2.5); review various emails from and regarding various prospective buyers/ participants in sale process (.3); conference with C. Murray regarding status of same (.5)	3.30	\$750.00	\$2,475.00
Service	08/23/2024	Asset Analysis and Recovery: Review documents relating to the various trusts to consider the rights and/ or options available to the trustee (1.8); draft comprehensive memo summarizing information relating to the various trusts, the assets held by trusts, and providing legal analysis and recommendation to the trustee regarding possible objections to exemptions (4.4)	6.20	\$495.00	\$3,069.00
Service	08/23/2024	Asset Analysis and Recovery: Continue to review issues relating to homestead exemption and other transfers and review cases/legal research (5.6); review email regarding prospective buyer for Lake property and respond to same and conference with C. Murray regarding same (.5)	6.10	\$750.00	\$4,575.00

Invoice # 10 - 09/10/2024

Service	08/26/2024	Asset Analysis and Recovery: Review sale issues with lakehouse, broker and employment issues (2.0); conference with C. Murray regarding same (.2); review email from neighbor about golf carts and conference with J. Chiba and C. Murray regarding same (.2)	2.40	\$750.00	\$1,800.00
Service	08/26/2024	Claims Administration and Objections: Review orders on fees and emails from various professionals requesting payment (.2); conference with C. Murray regarding same (.5)	0.70	\$750.00	\$525.00
Service	08/26/2024	Asset Analysis and Recovery: Review and conference with C. Murray regarding credit card processing issues (.4)	0.40	\$750.00	\$300.00
Service	08/27/2024	Asset Analysis and Recovery: Call with representative of potential buyer regarding sale options/auction process in bankruptcy (.4); post-call meeting with M. Dearman, J. Wolfshohl and C. Murray regarding same (.3); conference with C. Murray regarding same (.4); conference with C. Murray regarding offer on Lakehouse (.2); call with B. Schleizer regarding lake property, DIP Account, and credit card processing (.5); conference with C. Murray regarding same and status of various ongoing projects (.6); review email from J. Chiba regarding personal property questions and exemptions (3.0)	5.40	\$750.00	\$4,050.00
Service	08/28/2024	Asset Analysis and Recovery: Conference with C. Murray regarding sale motion and issues raised by US Trustee (1.0); legal research relating to same (.8); review email regarding filmmaker request to use sound snippet and conference with C. Murray regarding same (.2); review various emails regarding auction timeline and respond to same and address questions regarding due diligence (.2); conference with owner/president of prospective buyer of assets at auction (.3); conference with C. Murray regarding same (.2); review NDA's returned to date (.2); discuss proposed revisions to sale order (.2)	3.30	\$750.00	\$2,475.00
Service	08/28/2024	Claims Administration and Objections: Conference with C. Murray regarding FSS professional fees and timing and source of payment and conference with A. Catmull regarding same (.5)	0.50	\$750.00	\$375.00
Service	08/28/2024	Claims Administration and Objections: Conference with C. Murray regarding status of resolution of proration between creditor groups (.3)	0.30	\$750.00	\$225.00
Service	08/29/2024	Case Administration: Strategy meeting with trustee's legal team to discuss pending issues regarding sale of assets, pending litigation, and potential resolutions of lien disputes (0.5)	0.50	\$495.00	\$247.50
Service	08/29/2024	Asset Analysis and Recovery: Participate in weekly trustee legal team call regarding open projects and	5.70	\$750.00	\$4,275.00

Invoice # 10 - 09/10/2024

strategy session (.7); conference with C. Murray regarding same (.2); conference with C. Murray regarding discussions with V. Driver regarding 523 issues (.3); conference call with A. Catmull regarding professional fees and payment timing and source (.5); continue to evaluate issues relative to claimed exemptions (2.9); begin to review proposal on sale of Lake house (.4); and conference with C. Murray regarding same (.2); review emails relating to motion to remand and motion to transfer removed actions and conference with C. Murray regarding same (.5)					
Service	08/30/2024	Asset Analysis and Recovery: Respond to email from T. Holman regarding availability of assets (0.1)	0.10	\$495.00	\$49.50
Service	08/30/2024	Asset Analysis and Recovery: Draft second stipulation and agreed order to extend deadline for objections to Debtor's claimed exemptions and provide to Debtor's counsel for commentary (0.5); conference with E. Jones regarding same (.2)	0.70	\$495.00	\$346.50
Service	08/30/2024	Claims Administration and Objections: Review status of pending Texas litigation and review stay order regarding same (.5)	0.50	\$750.00	\$375.00
Service	08/30/2024	Asset Analysis and Recovery: Conference call with V. Driver regarding sale motion and auction and issues relating to exemptions (.7); conference with C. Murray regarding same (.2); conference with C. Murray regarding substantive responses to potential objections or issues relating to sale/auction of certain assets (1.0); conference with J. Wolfshohl regarding status of issues relating to professional fees and potential objections or issues relating to sale/auction of certain assets (.5); conference call with A. Catmull regarding filing motion to order payment of FSS professional fees and conference call with C. Murray regarding same (.5)	2.90	\$750.00	\$2,175.00
				Total	\$76,454.50

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 22-33553
ALEXANDER E. JONES	§	(Chapter 7)
	§	
Debtor.	§	

**FOURTH MONTHLY FEE STATEMENT OF JONES MURRAY LLP AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR
ALLOWANCE OF COMPENSTION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant:	Jones Murray LLP, as proposed bankruptcy counsel for Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	Order at Dkt. No. 794
Period for which Fees and Expenses are Incurred:	September 1, 2024 through and including August 30, 2024
Interim Fees Incurred:	\$117,060.00
Interim Payment of Fees Requested (80%):	\$93,648.00
Interim Expenses Incurred:	\$1,588.60
Total Fees and Expenses Due:	\$95,236.60

This is the Fourth Monthly Fee Statement.

Jones Murray LLP (“JM”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Fourth Monthly Fee Statement (the “Fee Statement”) for the period from September 1, 2024 through September 30, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [pending, motion filed at Docket No. 757] (the “Interim Compensation Order”).

JM requests compensation for professional services rendered in the amount of \$117,060.00 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,588.60 (the “Expenses”), for the period from September 1, 2024 through September 30, 2024. Eighty percent (80%) of the fees equals \$93,648.00 and one hundred percent (100%) of the Expenses equals \$1,588.60 for a total requested amount of \$95,236.60.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by JM attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. JM’s invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, JM respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$93,648.00 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$1,588.60 for a total amount of \$95,236.60.

Dated November 3, 2024.

Respectfully submitted,

JONES MURRAY LLP

/s/ Erin E. Jones

Erin E. Jones

Texas Bar No. 24032478

erin@jonesmurray.com

602 Sawyer St., Suite 400

Houston, TX 77007

Tel. (832) 529-1999

CO-COUNSEL FOR THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on November 3, 2024.

/s/ Erin E. Jones

Erin E. Jones

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	87.5	\$58,917.50
Asset Disposition	9.0	\$6,214.50
Case Administration	24.7	\$14,439.00
Claims Administration and Objections	30.8	\$11,250.00
Employment/Fee Application	6.8	\$4,131.00
Litigation/Other Contested Matters	30.6	\$22,108.50
TOTAL	189.4	\$117,060.00

EXHIBIT 2

SUMMARY OF OUT OF POCKET EXPENSES

Expense Description	Cost
Postage	\$295.48
Parking	\$60.00
Travel Lodging	\$1,233.12
TOTAL EXPENSES	\$1,588.60

EXHIBIT 3








SUMMARY OF TIME EXPENDED BY BILLING PROFESSIONALS

Professional	Hourly Rate	Total Hours
Erin E. Jones, <i>Partner</i>	\$750.00	129.4
Jacqueline Q. Chiba, <i>Associate</i>	\$495.00	41.4
Apollo Pham, <i>Paralegal</i>	\$95.00	18.6
TOTAL		189.4

Exhibit 4

Activities Export

11/03/2024
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Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/03/2024		Fee/Employment Applications: Begin conflicts check process for disclosures and application to retain N&N as IT professional, including conference with Trustee regarding same (0.8)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.80h	\$495.00	-	\$396.00
09/03/2024		Fee/Employment Applications: Review and respond to email regarding retaining IP/IT professionals and conference with C. Murray regarding same (0.2)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
09/03/2024		Asset Disposition: Review contract for sale of lake house and mark-up with necessary revisions, trustee addendum and other bankruptcy related issues (2.0); conference with C. Murray regarding same (0.3)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.30h	\$750.00	-	\$1,725.00
09/04/2024		Asset Analysis and Recovery: Various conferences with Trustee team regarding NDA with prospective buyer and question from V. Driver regarding same (0.3); telephone conference with B. Schleizer, V. Driver, C. Stephenson A. Jones, and C. Murray regarding auction issues, NDA's, IP related issues and other pending details regarding FSS winddown and personal estate	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	5.00h	\$750.00	-	\$3,750.00
							\$0.00 0.00h	\$118,648.60 189.40h







Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		<p>issues (0.6), conference with C. Murray regarding strategy relating to these issues (0.7), conference with V. Driver regarding same, ESG adversary and claims, auction related issues (0.6) and conference with C. Murray regarding issues discussed with V. Driver (0.3); review ESG docket and live orders (0.3) and conference call with J. Patterson regarding ESG adversary status conference and issues in dispute (0.4) and conference with C. Murray regarding same (0.2); conference call with W. Cicack regarding sale issues and status conference (0.5) and conference with C. Murray regarding same (0.1); conference call with S. Lemmon and C. Murray regarding status conference and pending adversary with PQPR (0.5) and conference with C. Murray regarding same as well as general issues regarding resolution of disputes concerning PQPR (0.5)</p> <p>● Unbilled</p>						
09/04/2024	🕒	<p>Fee/Employment Applications: Conference with L. Freeman regarding FSS professional fee orders and payment and conference with C. Murray regarding same (0.4)</p> <p>● Unbilled</p>	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

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Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/05/2024		Case Administration: Strategy meeting regarding pending motions and other issues related to disposition of assets with trustee's legal team (0.9); conference with E. Jones and C. Murray regarding same (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.40h	\$495.00	-	\$693.00
09/05/2024		Asset Analysis and Recovery: Conference with E. Jones and C. Murray regarding corporate authority issues (0.5); review research materials relating to same (0.5); and draft and send correspondence to M. Dearman and J. Stevens regarding corporate authority under Texas law (0.4)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.40h	\$495.00	-	\$693.00
09/05/2024		Case Administration: Prepare for and participate in strategy meeting regarding pending motions and other issues related to disposition of assets with trustee's legal team (0.9); conference with J. Chiba and C. Murray regarding same (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.40h	\$750.00	-	\$1,050.00
09/05/2024		Asset Analysis and Recovery: Conference with J. Chiba and C. Murray regarding corporate authority issues (0.5); review materials relating to same prepared by J. Chiba and correspondence regarding same	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		(0.5) ● Unbilled						
09/05/2024	🕒	Asset Analysis and Recovery: Conference call with sales professionals and sales teams regarding issue specific to auction and sale process (0.7); review various internal emails and documents relating to sales process and procedures and provide comments to same (1.3); various conferences with C. Murray regarding same (0.4) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.40h	\$750.00	-	\$1,800.00
09/05/2024	🕒	Asset Analysis and Recovery: Continue to review proposal to purchase lake house and revise contract, trustee addendum and other special provisions and conference with C. Murray to review same (1.9); review draft motion to sell assets of FSS from M. Dearman and discuss comments with C. Murray (.6) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.50h	\$750.00	-	\$1,875.00
09/05/2024	🕒	Other Contested Matters: Review draft motion to transfer and draft initial comments to same (.7); conference with C. Murray regarding same (.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
09/05/2024	🕒	Case Administration: Review all	00040-Christopher Murray,	Erin Jones	0.20h	\$750.00	-	\$150.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export








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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		pending hearings/deadlines in various proceedings and review same with C. Murray (0.2) ● Unbilled	Chapter 7 Trustee In re Alexander E. Jones					
09/05/2024	🕒	Claims Administration and Objections: Various conferences internally regarding information mediation with PQPR and D. and C. Jones's counsel and confirm same for September 13th (.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
09/06/2024	🕒	Case Administration: Review related / associated cases and prepare notices of appearances and requests for service for same (1.0) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.00h	\$495.00	-	\$495.00
09/06/2024	🕒	Asset Analysis and Recovery: Assist E. Jones in preparation for (0.3) and participate in status conference in adversary proceeding for ESG (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.60h	\$495.00	-	\$297.00
09/06/2024	🕒	Asset Analysis and Recovery: Review docket, Draft notice of status conference on Trustee's motion to winddown FSS and sell assets, conference with E. Jones and C. Murray regarding same, and prepare notice for service and filing (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.50h	\$495.00	-	\$247.50
							\$0.00 0.00h	\$118,648.60 189.40h

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Activities Export

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Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/06/2024		Asset Analysis and Recovery: Conference with J. Chiba in preparation for (0.3) and participate with C. Murray in status conference in adversary proceeding for ESG and conference with C. Murray regarding same (0.6)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
09/06/2024		Asset Analysis and Recovery: Review docket, draft notice of status conference on Trustee's motion to winddown FSS prepared by J. Chiba (0.2); conference with J. Chiba and C. Murray regarding preparation and service scope for same (0.2)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
09/09/2024		Other Contested Matters: Telephone conference with V. Driver regarding agenda for 9/11 status conference and pending 523 litigation (0.5); conference with C. Murray regarding same (0.2); conference with C. Murray regarding Tx/Ct pending litigation (.3)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
09/09/2024		Asset Disposition: Continue to draft, edit, revise emergency motion to sell the lake house and exhibits to same and draft proposed order (1.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.50h	\$750.00	-	\$1,125.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/09/2024	🕒	Fee/Employment Applications: Continue to draft, edit, and revise third fee statement (1.1) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
09/09/2024	🕒	Asset Analysis and Recovery: Review email from C. Murray regarding tax treatment conversation with H. May relative to FSS (0.1); continue to evaluate substantive consolidation issues and various conferences with C. Murray regarding same (0.9); various conferences regarding the auction/sale and winddown of FSS (.7) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.70h	\$750.00	-	\$1,275.00
09/09/2024	🕒	Asset Analysis and Recovery: Continue to review and revise motion to transfer venue and responses to motions to remand in the two removed matters in WDTX (1.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.30h	\$750.00	-	\$975.00
09/10/2024	💵	Postage/Copies - Mailout of Notice of Status Conference ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.00	\$295.48	-	\$295.48
09/10/2024	🕒	Asset Disposition: Various conferences with C. Murray and legal team internally for final revisions/comments to emergency	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.30h	\$750.00	-	\$975.00
							\$0.00 0.00h	\$118,648.60 189.40h

7/32

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		motion to sell lake house (0.5); draft final revisions to emergency motion to sell lake house and finalize for filing (0.8) ● Unbilled						
09/10/2024	🕒	Case Administration: Prepare for status conference on all pending issues (1.0); Prepare C. Murray for status conference/update regarding status of various pending matters (.8) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.80h	\$750.00	-	\$1,350.00
09/10/2024	🕒	Asset Analysis and Recovery: Review and respond to various emails regarding sale auction process and suggested revisions to same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
09/10/2024	🕒	Other Contested Matters: Continue to evaluate remand issues relating to removed litigation in WDTX and motion to transfer venue and conduct legal research on various issues relating to same (2.2); conference with C. Murray regarding effect of turnover order on bankruptcy proceedings and positions of various parties (0.7) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.90h	\$750.00	-	\$2,175.00
09/10/2024	🕒	Fee/Employment Applications: Finalize third fee statement for filing (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
							\$0.00 0.00h	\$118,648.60 189.40h






Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/11/2024	🕒	Asset Analysis and Recovery: Conference with E. Jones and C. Murray to prepare for (0.5) and participate in status hearing on motion to winddown and to discuss other pending matters with related adversaries (0.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.00h	\$495.00	-	\$495.00
		● Unbilled						
09/11/2024	🕒	Asset Analysis and Recovery: Conference with J. Chiba and C. Murray to prepare for (0.5); meeting with C. Murray and J. Wolfshohl to prepare for update on various issues at status conference (1.0) and participate in status hearing on motion to winddown and to discuss other pending matters with related adversaries (0.5); review various emails regarding sale website and related IT issues (0.2); call with V. Driver regarding questions about sale/ auction process and timing of same and staffing concerns (0.6)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.80h	\$750.00	-	\$2,100.00
		● Unbilled						
09/11/2024	🕒	Case Administration: Review various emails regarding settings from the Court on various pending matters and notice of same with attention to service issues (0.6)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.60h	\$750.00	-	\$450.00
		● Unbilled						
							\$0.00	\$118,648.60
							0.00h	189.40h

Activities Export

11/03/2024
6:57 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/11/2024		Asset Analysis and Recovery: Multiple conference calls with S. Lemmon to discuss settings on pending matters, plan relating to sale of FSS assets, FSS professional fees/motion relating to same, PQPR lien issues, reconciliation of sales with Dr. Jones related entities (2.0); conference with C. Murray regarding same (0.3); review PQPR fulfillment contract and orders (0.4); draft email to B. Schleizer and J. Shulse regarding same and conference with C. Murray regarding requesting reporting needed to evaluate reconciliation (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	3.20h	\$750.00	-	\$2,400.00
09/11/2024		Fee/Employment Applications: Review order on motion filed by FSS professionals regarding payment of fees without additional hearing and conference with C. Murray regarding same (0.5); review various emails from FSS professionals with requests for payment and instructions and discuss same with C. Murray (0.2)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.70h	\$750.00	-	\$525.00
09/11/2024		Other Contested Matters: Review email regarding CT request for discovery (0.1); review form of inquiry/post judgment discovery and conference with C. Murray	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.70h	\$750.00	-	\$525.00
							\$0.00 0.00h	\$118,648.60 189.40h 10/32

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding same (0.6) ● Unbilled						
09/11/2024	🕒	Case Administration: Extended conference with Trustee to review various pending issues, how they relate, conferences with other parties, and status of each, including: sale of lake house with some personal property included, meeting with A. Jones team to discuss sale/auction of FSS assets, PQPR litigation and lien issues as well as reconciliation of sales, FSS professional fee payments, and ESG litigation (1.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.20h	\$750.00	-	\$900.00
09/12/2024	🕒	Case Administration: Strategy meeting with Trustee's legal team to discuss pending hearing, motions, and other issues (0.9); conference with E. Jones and C. Murray regarding specific projects and research issues for analysis of assets (0.4) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.30h	\$495.00	-	\$643.50
09/12/2024	🕒	Fee/Employment Applications: Review and revise engagement agreement from N&N and provide to trustee with commentary (1.2); conference with E. Jones regarding same (0.3); draft and revise application to employ N&N, proposed order, and supporting	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.50h	\$495.00	-	\$1,237.50
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		exhibits (1.0) ● Unbilled						
09/12/2024	🕒	Case Administration: Prepare for (0.3) and participate in strategy meeting with Trustee's legal team to discuss pending hearing, motions, and other issues (0.9); conference with J. Chiba and C. Murray regarding specific projects and research issues for analysis of assets (0.4); review various emails regarding issues surrounding auction of FSS assets from auctioneer and conference with C. Murray regarding same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.10h	\$750.00	-	\$1,575.00
09/12/2024	🕒	Fee/Employment Applications: Conference with J. Chiba regarding revisions to engagement agreement with N&N on IT issues (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
09/13/2024	🕒	Asset Disposition: Assist E. Jones and C. Murray with preparation for (0.2) and participate and observe hearing on emergency motion to sell real property (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.40h	\$495.00	-	\$198.00
09/13/2024	🕒	Claims Administration and Objections: Prepare for (0.6) and participate in informal mediation of various disputes with counsel for	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.40h	\$495.00	-	\$1,188.00
							\$0.00 0.00h	\$118,648.60 189.40h

12/32

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		PQPR for potential resolution of disputes with PQPR and FSS (0.8); conference with C. Murray and E. Jones regarding same (1.0) ● Unbilled						
09/13/2024	🕒	Asset Disposition: Conference with C. Murray, J. Chiba, and J. Wolfshohl regarding hearing on sale of lake house (0.5); observe hearing regarding same (0.2); various conferences with broker regarding same (0.2) and conference with C. Murray regarding same and documents to sign (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
09/13/2024	🕒	Claims Administration and Objections: Review memorandum regarding PQPR issues in preparation for informal mediation (1.2); prepare with J. Chiba and C. Murray regarding PQPR informal mediation (0.6) and participate in informal mediation of various disputes with counsel for PQPR for potential resolution of disputes with PQPR and FSS (1.0); conference with C. Murray and J. Chiba regarding same after conclusion of mediation discussions (0.8); extended conference with C. Murray regarding issues and litigation claims surrounding trusts (0.7)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.20h	\$750.00	-	\$3,150.00
							\$0.00 0.00h	\$118,648.60 189.40h




Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
09/15/2024	🕒	Claims Administration and Objections: Review documents produced by UCC relating to PQPR (2.4)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.40h	\$495.00	-	\$1,188.00
		● Unbilled						
09/15/2024	🕒	Other Contested Matters: Review and respond to C. Murray email regarding PQPR note and alleged lien and valuation and conference with C. Murray regarding same (0.5); various conferences with J. Chiba regarding same (0.7)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.20h	\$750.00	-	\$900.00
		● Unbilled						
09/15/2024	🕒	Claims Administration and Objections: Extended conference call with C. Murray regarding discussions with various parties regarding format for potential global resolution, PQPR issues, and Trust issues (1.1)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
		● Unbilled						
09/16/2024	🕒	Claims Administration and Objections: Review and respond to various emails with K. Starling conferring regarding status of PQPR research issue (0.3); conference with E. Jones regarding same (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.60h	\$495.00	-	\$297.00
		● Unbilled						
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
6:57 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/16/2024		Claims Administration and Objections: Conference with J. Chiba regarding emails with K. Starling regarding status of PQPR research issue (0.3); review various emails from S. Lemmon and S. Roberts and forward to team for PQPR related issues (0.2); review and respond to M. Dearman email regarding information mediation with PQPR and release issues (0.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.70h	\$750.00	-	\$525.00
		● Unbilled						
09/16/2024		Other Contested Matters: Review timeline on turnover order obtained by Texas in relation to motion to compel and responses to motions to remand and motion to transfer venue (1.7); conference with A. Catmull regarding same and concern regarding payment of professional fees (0.4); conference with C. Murray regarding same (0.5); conference with J. Wolfshohl regarding same (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.90h	\$750.00	-	\$2,175.00
		● Unbilled						
09/17/2024		Other Contested Matters: Follow up with A. Catmull regarding removed causes of action and timeline on turnover and professional fee issues and conference with C. Murray regarding same (0.7); review communications with counsel for Tx families regarding same (0.1)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
							\$0.00	\$118,648.60
							0.00h	189.40h

15/32

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Unbilled						
09/17/2024		Asset Disposition: Review lake house closing documents and contracts and forward same to trustee legal team (0.4)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
		Unbilled						
09/18/2024		Claims Administration and Objections: Confer with E. Jones regarding research needed into PQPR financial status and alleged lien (0.5); confer regarding projects needed with A. Pham regarding identification of PQPR financial documents (0.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.00h	\$495.00	-	\$495.00
		Unbilled						
09/18/2024		Claims Administration and Objections: Research relating to PQPR records and financial history (3.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	3.20h	\$95.00	-	\$304.00
		Unbilled						
09/18/2024		Claims Administration and Objections: Confer with J. Chiba regarding research needed into PQPR financial status and alleged lien (0.5); conferences with C. Murray regarding same (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
		Unbilled						
09/19/2024		Case Administration: Prepare for (0.2) and participate in conference call with trustee's legal team to discuss pending sale motion,	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.10h	\$495.00	-	\$1,039.50
							\$0.00	\$118,648.60
							0.00h	189.40h

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		claims of various creditors, potential assets for recovery and other pending issues in case (0.9); post-call debrief with E. Jones and C. Murray to discuss strategy and plan of action with respect to investigation of specific assets and claims (1.0) ● Unbilled						
09/19/2024	🕒	Other Contested Matters: Research regarding potential motion for contempt and to show cause regarding turnover order (2.3); begin to draft potential pleadings regarding same (0.9) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	3.30h	\$495.00	-	\$1,633.50
09/19/2024	🕒	Claims Administration and Objections: Research relating to PQPR records and financial history (4.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	4.50h	\$95.00	-	\$427.50
09/19/2024	🕒	Case Administration: Prepare for team call and conference with C. Murray regarding same (0.7); participate in conference call with trustee's legal team to discuss pending sale motion, claims of various creditors, potential assets for recovery and other pending issues in case (0.9); conference with J. Chiba and C. Murray to discuss strategy and plan of action with respect to investigation of	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.60h	\$750.00	-	\$1,950.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		specific assets and claims (1.0)						
		● Unbilled						
09/19/2024	🕒	Asset Analysis and Recovery: Review UST objection to motion to winddown and begin to outline issues for reply and review authorities cited by UST (2.4); conference with C. Murray regarding same (0.6); conference with C. Murray and J. Wolfshohl regarding UST objection to motion to winddown FSS (0.7); research issues relative to what constitutes estate property, jurisdictional issues, and sale of non-estate property in other bankruptcy cases and forward same to Trustee legal team (2.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	6.20h	\$750.00	-	\$4,650.00
		● Unbilled						
09/19/2024	🕒	Asset Analysis and Recovery: Telephone conference with A. Catmull regarding UST objection to motion to winddown FSS through auction and issues relating to turnover order obtained by Tx families (0.3); conference with C. Murray regarding discussion with A. Catmull regarding same (0.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
		● Unbilled						
09/20/2024	🕒	Claims Administration and Objections: Research relating to PQPR records and financial history (2.4)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	2.40h	\$95.00	-	\$228.00
							\$0.00	\$118,648.60
							0.00h	189.40h

Activities Export

11/03/2024
6:57 PM

Date	▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
● Unbilled									
09/20/2024	🕒		Asset Disposition: Review and respond to J. Willoughby regarding various issues on lake house sale and remaining steps for closing (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
● Unbilled									
09/20/2024	🕒		Asset Analysis and Recovery: Review WSJ article regarding proposed winddown and sale of FSS assets and UST objection and conference with C. Murray regarding same (0.4); Review draft and respond with comments to reply to UST objection to motion to winddown FSS and sell assets (3.0); Continue to evaluate substantive consolidation and conference with C. Murray and Porter Hedges team regarding same (1.9); review Texas statement in support of sale (0.2); draft lengthy email to trustee legal team regarding Texas statement in support of sale and analysis of issues relating to same (0.6); various lengthy conferences with C. Murray regarding same (0.8); telephone conference with A. Catmull regarding same (0.4); review A. Jones limited objection to winddown and sale of FSS assets (.3); conference with J. Wolfshohl regarding same (0.2); conference with C. Murray regarding same	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	8.10h	\$750.00	-	\$6,075.00
								\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		(0.3) ● Unbilled						
09/22/2024	🕒	Other Contested Matters: Continue to review and make revisions to motion to transfer venue, responses to motions to remand (1.0) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
09/22/2024	🕒	Asset Analysis and Recovery: Continue to review and provide comments to reply to UST objection to motion to winddown FSS and sell assets (2.5); various conferences with C. Murray regarding same (0.5); continue to review and provide comments to analysis regarding substantive consolidation (0.7); review various messages between parties and Tx families regarding scope of representations regarding turnover order and application to administration of bankruptcy estate and conference with C. Murray regarding same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.20h	\$750.00	-	\$3,150.00
09/23/2024	🕒	Asset Analysis and Recovery: Review and consider correspondence from T. Holman regarding Debtor's assets relating to lake house (0.3); multiple discussions same with E. Jones (0.4); draft and send response to	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.10h	\$495.00	-	\$544.50
							\$0.00 0.00h	\$118,648.60 189.40h

20/32






Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		T. Holman (0.2); review responses to same (0.2)						
		● Unbilled						
09/23/2024	🕒	Asset Analysis and Recovery: Review various emails between T. Holman and J. Chiba regarding boat and golf carts (0.1); multiple conferences with J. Chiba regarding same (0.4); review docket and chapter 11 pleadings relating to assets administered in chapter 11 case (0.6) and conference with C. Murray regarding same (0.2); telephone conference with T. Holman regarding same and other information relating to sale of lake house and rights of first refusal (0.6); conference with V. Driver regarding same (0.1); conference with C. Murray regarding issues relating to lake house and personal property at the house and what was previously administered (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.30h	\$750.00	-	\$1,725.00
		● Unbilled						
09/23/2024	🕒	Other Contested Matters: Continue to draft, edit, and revise motions to transfer venue in both removed actions and in light of recent pleadings relating to winddown and sale of FSS assets (2.2); continue to draft revisions to responses to motions to remand (0.9)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	3.10h	\$750.00	-	\$2,325.00
		● Unbilled						
							\$0.00	\$118,648.60
							0.00h	189.40h

Activities Export

11/03/2024
6:57 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/23/2024		Asset Analysis and Recovery: Continue to review drafts of reply to UST response to motion to winddown and sale of FSS assets and provide comments to same (0.5); conference with C. Murray regarding various turns of draft response and comments to same (.6)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
09/23/2024		Other Contested Matters: Review various messages between Tx counsel and professional fee claimants regarding stipulation on attorneys' fees (0.5); review draft stipulation (0.2); telephone conference with A. Catmull regarding status of same (0.2)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
09/23/2024		Asset Analysis and Recovery: Extended telephone conference with V. Driver regarding A. Jones objection to motion to winddown and sell FSS assets (0.6); conference with C. Murray regarding same (0.2); draft email to Trustee legal team regarding scope of A. Jones objection (0.4); extended conference with J. Wolfshohl regarding same and regarding stipulation on professional fees (0.7); draft revised proposed order to resolve A. Jones objection (1.0); circulate internally for review and comment	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.00h	\$750.00	-	\$3,000.00
							\$0.00 0.00h	\$118,648.60 189.40h

22/32

Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		(0.3); circulate to V. Driver for comment and review responses to same (0.8) ● Unbilled						
09/23/2024	🕒	Asset Analysis and Recovery: Prepare for hearing on motion to winddown and sell FSS assets, including: conference with C. Murray and J. Wolfshohl (1.0) and preparation of proffer of C. Murray (0.7) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.70h	\$750.00	-	\$1,275.00
09/24/2024	🕒	Asset Analysis and Recovery: Review pleadings, responses, and other relevant documents to assist E. Jones and C. Murray prepare for hearing on the motion for authority to winddown FSS (2.9); participate in hearing on the motion for authority to winddown FSS and status conference on PQPR adversary (0.6); conference with E. Jones and C. Murray regarding supplemental order regarding dismissal (0.4) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	3.90h	\$495.00	-	\$1,930.50
09/24/2024	🕒	Asset Analysis and Recovery: Prepare for hearing on motion for authority to winddown, including review pleadings, responses, and other relevant documents and exhibits (1.0); and various conferences with J. Chiba, J.	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.80h	\$750.00	-	\$3,600.00
							\$0.00 0.00h	\$118,648.60 189.40h










Activities Export

11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		<p>Wolfshohl, and C. Murray regarding same (1.1); represent Trustee at hearing on the motion for authority to winddown FSS and status conference on PQPR adversary (0.6); after hearing meeting with A. Moshenberg, J. Wolfshohl, and C. Murray (.2), and meeting with H. Nguyen, C. Murray, and J. Wolfshohl regarding supplemental order on dismissal (1.0); review and respond to various emails from counsel for creditors in both cases and V. Driver regarding same (0.5); conference with J. Chiba and C. Murray regarding supplemental order regarding dismissal and finalize to be uploaded (0.4)</p> <p>● Unbilled</p>						
09/24/2024	🕒	<p>Other Contested Matters: Review and respond to various emails regarding motions to transfer venue and responses to motions to remand (0.3); send minor revisions to draft motions to remand to K. Starling (0.4)</p> <p>● Unbilled</p>	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.70h	\$750.00	-	\$525.00
09/25/2024	🕒	<p>Claims Administration and Objections: Research relating to PQPR records and financial history (2.6)</p> <p>● Unbilled</p>	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	2.60h	\$95.00	-	\$247.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/25/2024		Claims Administration and Objections: Continue to review and evaluate analysis regarding substantive consolidation, including review of claims (1.2)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.20h	\$750.00	-	\$900.00
09/25/2024		Other Contested Matters: Continue to draft, edit, revise responses to motions to remand (1.3)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.30h	\$750.00	-	\$975.00
09/25/2024		Asset Analysis and Recovery: Extended work session and conference with C. Murray regarding supplemental order regarding dismissal and sale of FSS assets, claims of Tx families and potential global resolution, auction process and IP issues, issues regarding exemptions and update from V. Driver (1.0)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
09/26/2024		Case Administration: Strategy meeting with members of Trustee's legal team to discuss FSS winddown, pending sale of assets, alleged liens and other issues (0.7); various conferences with E. Jones regarding same (0.4); conference with E. Jones and C. Murray regarding same (0.3)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.40h	\$495.00	-	\$693.00
09/26/2024		Asset Analysis and Recovery:	00040-Christopher Murray,	Jacqueline	0.50h	\$495.00	-	\$247.50
							\$0.00 0.00h	\$118,648.60 189.40h
25/32								

Activities Export

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Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Draft stipulation and agreed order further extending deadline for Trustee's response to Debtor's claimed exemptions and circulate to Debtor's counsel for commentary (0.3); conference with C. Murray regarding same (0.1); conference with E. Jones regarding same (0.1) ● Unbilled	Chapter 7 Trustee In re Alexander E. Jones	Chiba				
09/26/2024	🕒	Claims Administration and Objections: Research relating to PQPR records and financial history (2.9) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	2.90h	\$95.00	-	\$275.50
09/26/2024	🕒	Case Administration: Prepare for (0.2) and participate in weekly strategy meeting with members of Trustee's legal team to discuss FSS winddown, pending sale of assets, alleged liens and other issues (0.7); various conferences with J. Chiba regarding same (0.4); conference with J. Chiba and C. Murray regarding same (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.60h	\$750.00	-	\$1,200.00
09/26/2024	🕒	Asset Analysis and Recovery: Conference with J. Chiba regarding draft stipulation and agreed order further extending deadline for Trustee's response to Debtor's claimed exemptions, conference with C. Murray	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
							\$0.00 0.00h	\$118,648.60 189.40h

26/32

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding same, and review order regarding same (0.2)						
		● Unbilled						
09/27/2024	🕒	Asset Disposition: Review correspondence from title insurance company and consider questions asked/documents requested (0.4); Confer with Trustee regarding title insurance for McCormick property (0.1); locate and review documents requested by title insurance company (1.0); draft and send response to title insurance company's questions and provide relevant documents (0.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.70h	\$495.00	-	\$841.50
		● Unbilled						
09/27/2024	🕒	Asset Analysis and Recovery: Call and leave voice mail for C. Stephenson regarding proposed extension of exemption response deadline (0.1); draft and send follow up email to C. Stephenson and V. Driver regarding same (0.1)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.20h	\$495.00	-	\$99.00
		● Unbilled						
09/27/2024	🕒	Asset Analysis and Recovery: Discussion with C. Stephenson regarding stipulation to extend the deadline for the Trustee to object to exemptions (0.2); revise, finalize, and file stipulation for filing (0.2); various conferences with E. Jones and C. Murray regarding	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.70h	\$495.00	-	\$346.50
							\$0.00	\$118,648.60
							0.00h	189.40h

27/32

Activities Export

11/03/2024
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Date	▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			same (0.3) ● Unbilled						
09/27/2024		🕒	Asset Analysis and Recovery: Research relating to PQPR records and financial history (3.0) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	3.00h	\$95.00	-	\$285.00
09/27/2024		🕒	Asset Analysis and Recovery: Various conferences with J. Chiba and C. Murray regarding issues relating to exemptions and extension of deadlines (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
09/27/2024		🕒	Claims Administration and Objections: Conference call with C. Murray and J. Wolfshohl regarding Tx/Ct global resolution and proposal regarding same (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
09/27/2024		🕒	Other Contested Matters: Draft, edit, revise, and finalize revisions to motions to transfer venue in two removed actions regarding garnishment and turnover proceedings (3.0); and many conferences with K. Starling regarding same (1.0); various conferences with C. Murray regarding same (0.4) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.40h	\$750.00	-	\$3,300.00
09/27/2024		🕒	Other Contested Matters: Draft, edit, revise, and finalize revisions	00040-Christopher Murray, Chapter 7 Trustee	Erin Jones	5.20h	\$750.00	-	\$3,900.00
								\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		to responses to motions to remand with exhibits in two removed actions regarding garnishment and turnover proceedings (4.0); many conferences with K. Starling regarding same (1.0); various conferences with C. Murray regarding same (0.2)	In re Alexander E. Jones					
		● Unbilled						
09/29/2024	🕒	Case Administration: Travel to Austin with C. Murray (3.0)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	3.00h	\$375.00	-	\$1,125.00
		● Unbilled						
09/29/2024	🕒	Asset Analysis and Recovery: Extended conference with C. Murray regarding Tx/Ct split issues and framework for global resolution (1.0); conference with C. Murray regarding sale/auction issues and operational issues relating to FSS in preparation for meeting with A. Jones business and legal team (1.2); conference call with B. Schleizer regarding agenda for meeting with A. Jones business and legal team and answer questions relating to auction/sale of assets (.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.70h	\$750.00	-	\$2,025.00
		● Unbilled						
09/30/2024	🕒	Fee/Employment Applications: Various conferences and draft additional revisions to proposed engagement letter with N&N and provide to P. Newton for	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.50h	\$495.00	-	\$247.50
							\$0.00	\$118,648.60
							0.00h	189.40h

29/32

Activities Export

11/03/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		commentary (0.5) ● Unbilled						
09/30/2024	🕒	Asset Analysis and Recovery: Conference with E. Jones regarding issues relating to merchant services provider and holdback (0.6); research background on dispute (2.0); review cases and pleadings relating to potential dispute with credit card processor (0.4); various conferences with E. Jones and C. Murray regarding same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	3.50h	\$495.00	-	\$1,732.50
09/30/2024	🕒	Asset Analysis and Recovery: Continue to review pleadings, background materials and documents relating to potential causes of action against merchant services provider (2.7); begin drafting complaint regarding same (2.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	5.20h	\$495.00	-	\$2,574.00
09/30/2024	🕒	Asset Analysis and Recovery: Conference with C. Murray regarding issues relating to merchant services provider and holdback dispute (0.5); multiple conferences with J. Chiba regarding same (1.1) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.60h	\$750.00	-	\$1,200.00
09/30/2024	🕒	Case Administration: Return travel	00040-Christopher Murray,	Erin Jones	3.00h	\$375.00	-	\$1,125.00
							\$0.00 0.00h	\$118,648.60 189.40h

Activities Export

11/03/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		to Houston (3.0) ● Unbilled	Chapter 7 Trustee In re Alexander E. Jones					
09/30/2024	🕒	Asset Analysis and Recovery: Prepare with C. Murray for meeting with A. Jones business and legal team and FSS business team, auctioneer, IT professionals onsite at studio (1.0); meeting at studio regarding FSS auction and operational issues, with auctioneer, with IT professionals, and with A. Jones business and legal team, and A. Jones (3.0) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.00h	\$750.00	-	\$3,000.00
09/30/2024	🕒	Other Contested Matters: Review lease agreement regarding termination, forward to J. Chiba, and conference with J. Chiba regarding same (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
09/30/2024	🕒	Asset Analysis and Recovery: Extended conference with C. Murray regarding auction and bidding issues relative to sequencing and maximizing value (1.0) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
09/30/2024	🕒	Asset Analysis and Recovery: Conference call regarding meeting with Tx counsel on next steps and global resolution (0.4); telephone conference regarding fee issues	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.60h	\$750.00	-	\$450.00
							\$0.00 0.00h	\$118,648.60 189.40h

31/32

Activities Export11/03/2024
6:57 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		and Tx turnover order; conference with C. Murray regarding same (0.2) ● Unbilled						
09/30/2024	\$	Parking - Austin ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00	\$60.00	-	\$60.00
09/30/2024	\$	Lodging x3 - for 9/29 and 9/30 travel to Austin for meeting at FSS Studios ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00	\$1,233.12	-	\$1,233.12
							\$0.00 0.00h	\$118,648.60 189.40h

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
ALEXANDER E. JONES	§	Case No. 22-33553
	§	(Chapter 7)
	§	
Debtor.	§	

**FIFTH MONTHLY FEE STATEMENT OF JONES MURRAY LLP AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR
ALLOWANCE OF COMPENSTION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

Name of Applicant:	Jones Murray LLP, as bankruptcy counsel for Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	Order at Dkt. No. 794
Period for which Fees and Expenses are Incurred:	October 1, 2024 through October 31, 2024
Interim Fees Incurred:	\$73,653.50
Interim Payment of Fees Requested (80%):	\$58,922.80
Interim Expenses Incurred:	\$1,358.61
Total Fees and Expenses Due:	\$60,281.41

This is the Fifth Monthly Fee Statement.

Jones Murray LLP (“JM”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Fifth Monthly Fee Statement (the “Fee Statement”) for the period from October 1, 2024 through October 31, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [pending, motion filed at Docket No. 757] (the “Interim Compensation Order”).

JM requests compensation for professional services rendered in the amount of \$73,653.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,358.61 (the “Expenses”), for the period from October 1, 2024 through October 31, 2024. Eighty percent (80%) of the fees equals \$58,922.80 and one hundred percent (100%) of the Expenses equals \$1,358.61 for a total requested amount of \$60,281.41.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by JM attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. JM’s invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, JM respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$58,922.80 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$1,358.61 for a total amount of \$60,281.41.

Dated November 8, 2024.

Respectfully submitted,

JONES MURRAY LLP

/s/ Erin E. Jones

Erin E. Jones

Texas Bar No. 24032478

erin@jonesmurray.com

602 Sawyer St., Suite 400

Houston, TX 77007

Tel. (832) 529-1999

CO-COUNSEL FOR THE CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on November 8, 2024.

/s/ Erin E. Jones

Erin E. Jones

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	70.6	\$47,678.00
Asset Disposition	0.7	\$474.00
Assumption/Rejection of Leases and Contracts	3.0	\$1,612.50
Case Administration	10.4	\$6,193.50
Claims Administration and Objections	16.1	\$12,075.00
Fee and Employment Applications	4.1	\$1,051.50
Other Contested Matters	8.2	\$4,569.00
TOTAL	113.1	\$73,653.50

EXHIBIT 2

SUMMARY OF OUT OF POCKET EXPENSES

Expense Description	Cost
Research Fees – ECF/PACER	\$738.30
Postage/Copies – Mailout	\$616.11
Parking	\$4.20
TOTAL EXPENSES	\$1,358.61











EXHIBIT 3

SUMMARY OF TIME EXPENDED BY BILLING PROFESSIONALS

Professional	Hourly Rate	Total Hours
Erin E. Jones, <i>Partner</i>	\$750.00	79.8
Jacqueline Q. Chiba, <i>Associate</i>	\$495.00	26.6
Apollo Pham, <i>Paralegal</i>	\$95.00	6.7
TOTAL		113.1










EXHIBIT 4

EXHIBIT 4**Activities Export**11/08/2024
6:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/01/2024		Asset Analysis and Recovery: Continue to draft complaint regarding credit card holdbacks and circulate to E. Jones and C. Murray for review (1.6)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.60h	\$495.00	-	\$792.00
10/01/2024		Claims Administration and Objections: Conference with C Murray regarding open issues with sale and WDTX cases (0.4); conference call with C. Murray and J. Wolfshohl regarding same (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
10/01/2024		Asset Analysis and Recovery: Review draft complaint regarding credit card holdbacks (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
10/02/2024		Claims Administration and Objections: Review various emails and responses regarding various pending matters including issues relating to Texas turnover order and conference with C. Murray regarding same (0.8)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
10/03/2024		Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (1.0)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.00h	\$495.00	-	\$495.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

Activities Export

11/08/2024
6:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/03/2024		Claims Administration and Objections: Review correspondence relating to terms of a potential resolution of claims for discussion with Trustee legal team (1.0); conference with C. Murray regarding same (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.50h	\$750.00	-	\$1,125.00
10/03/2024		Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (1.0)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
10/04/2024		Case Administration: Extended strategy meeting with E. Jones to discuss pending matters, disputes over assets, potential settlements, and status of various pending projects and analyses (2.1)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.10h	\$495.00	-	\$1,039.50
10/04/2024		Claims Administration and Objections: Conference with C. Murray and J. Wolfshohl regarding discussions with parties regarding concepts for potential resolution of claims (0.4)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.60h	\$750.00	-	\$450.00
10/04/2024		Asset Analysis and Recovery: Extended strategy meeting with J. Chiba to discuss pending matters, disputes over assets, potential settlements, and status of various	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.10h	\$750.00	-	\$1,575.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

2/22

Activities Export

11/08/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		pending projects and analyses (2.1) ● Unbilled						
10/07/2024	🕒	Fee/Employment Applications: Revise application to employ N&N in consideration of the Court's Supplemental Dismissal Order and provide to C. Murray for commentary and approval (0.6) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.60h	\$495.00	-	\$297.00
10/07/2024	🕒	Other Contested Matters: Status conference on removal action before the WDTX (0.4) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.20h	\$495.00	-	\$99.00
10/07/2024	🕒	Asset Analysis and Recovery: Conference call with W/ Stukenberg, K. Starling, M. Dearman regarding employment issues relating to FSS winddown (0.5); conference with C. Murray regarding same (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.70h	\$750.00	-	\$525.00
10/07/2024	🕒	Asset Analysis and Recovery: Various conference calls regarding approach to hearing/status conference in WDTX removed actions (0.4); conference with C. Murray to review various issues anticipated for hearing/status conference (0.7); conference with J. Wolfshohl regarding same (0.2); participate remotely in hearing in	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.70h	\$750.00	-	\$1,275.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

Activities Export

11/08/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		WDTX removed matters and conference with C. Murray regarding same (0.4) ● Unbilled						
10/07/2024	🕒	Asset Analysis and Recovery: Conference call with C. Murray and J. Wolfshohl regarding auction and sale and issues relating to sale of personal IP (0.6); email with IP counsel to set up time to discuss same (0.1); review correspondence from M. Dearman regarding various sale/IP issues (0.1) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
10/07/2024	🕒	Asset Analysis and Recovery: Review various emails and materials circulated by J. Tannenbaum regarding auction and sale issues and conference with C. Murray regarding same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
10/07/2024	🕒	Asset Analysis and Recovery: Review lake house closing documents and various emails regarding same and conference with C. Murray regarding same (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
10/08/2024	🕒	Claims Administration and Objections: Multiple extended	00040-Christopher Murray, Chapter 7 Trustee	Erin Jones	3.40h	\$750.00	-	\$2,550.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

Activities Export

11/08/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		telephone conferences and strategy sessions with C. Murray to discuss potential resolution of claims (1.9); discuss impact of Connecticut receivership action and removal of same (0.3); review pleadings in Connecticut receivership and removal to WDTX regarding scope of relief requested in receivership application and any overlap with estate (1.2)	In re Alexander E. Jones					
		● Unbilled						
10/09/2024	🕒	Asset Analysis and Recovery: Extended conference with C. Murray regarding status of discussions with PQPR regarding potential resolution of disputes (1.0)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
		● Unbilled						
10/10/2024	🕒	Assumption/Rejection of Leases and Contracts: Various emails and discussions regarding contract assumption/rejection deadlines with Trustee's legal team (0.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.50h	\$495.00	-	\$247.50
		● Unbilled						
10/10/2024	🕒	Fee/Employment Applications: Follow with N&N regarding proposed employment (0.1)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.10h	\$495.00	-	\$49.50
		● Unbilled						
10/10/2024	🕒	Assumption/Rejection of Leases and Contracts: Draft motion to extend 365 deadlines and	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.00h	\$495.00	-	\$990.00
					113.10h		\$0.00	\$73,653.50
							0.00h	113.10h

5/22

Activities Export

11/08/2024
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		proposed order (1.4); conference with C. Murray regarding same (0.2); revise motion to extend the 365 deadline to incorporate feedback from C. Murray and finalize same for filing (0.4) ● Unbilled						
10/10/2024	🕒	Fee/Employment Applications: Revise, finalize, and file the application to employ N&N (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.30h	\$495.00	-	\$148.50
10/10/2024	🕒	Asset Disposition: Review various emails regarding lake house sale / closing and conference with C. Murray regarding same (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
10/10/2024	🕒	Asset Analysis and Recovery: Multiple conferences with C. Murray regarding status of discussions with various parties regarding resolution of claims (0.3); conference with C. Murray regarding update on status of sale of personal IP (0.3); review additional background materials and auction platform information sent by auctioneer and provide comments to sales team regarding same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
10/10/2024	🕒	Assumption/Rejection of Leases and Contracts: Review various	00040-Christopher Murray, Chapter 7 Trustee	Erin Jones	0.50h	\$750.00	-	\$375.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

6/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		emails regarding 365 deadlines, conference with C. Murray and J. Wolfshohl regarding same, and conference with J. Chiba regarding preparation of motion to extend (0.5) ● Unbilled	In re Alexander E. Jones					
10/11/2024	🕒	Asset Analysis and Recovery: Research documents/financial records in discovery database relating to (2.8) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	2.80h	\$95.00	-	\$266.00
10/11/2024	🕒	Asset Analysis and Recovery: Extended work session and conferences with C. Murray regarding status and framework of potential resolution of claims (0.7); various conferences with C. Murray regarding update on auction procedures and sale process (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.20h	\$750.00	-	\$900.00
10/11/2024	🕒	Asset Disposition: Review various emails regarding lake house closing and conference with C. Murray regarding same (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
10/13/2024	🕒	Asset Analysis and Recovery: Review correspondence from M. Dearman regarding demand letter (0.1)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.10h	\$750.00	-	\$75.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

7/22










Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
10/14/2024	🕒	Asset Analysis and Recovery: Extended conference with C. Murray regarding discussions relating to potential resolution of claims (0.5); conference with C. Murray regarding response to issues relating to sale of FSS assets and A. Jones personal IP assets (0.6)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
		● Unbilled						
10/15/2024	🕒	Asset Disposition: Conference with C. Murray regarding analysis of and (0.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.20h	\$495.00	-	\$99.00
		● Unbilled						
10/15/2024	🕒	Other Contested Matters: Review chapter 11 fee analysis and conference with C. Murray regarding same (0.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.50h	\$495.00	-	\$247.50
		● Unbilled						
10/15/2024	🕒	Other Contested Matters: Conference call with E. Jones, C. Murray, and J. Wolfshohl to prepare for call with counsel for Connecticut plaintiffs (0.2); conference call with counsel for Connecticut plaintiffs (0.8); post-call debrief and strategy meeting with E. Jones and C. Murray (0.3)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.30h	\$495.00	-	\$643.50
		● Unbilled						
					113.10h		\$0.00	\$73,653.50
							0.00h	113.10h

Activities Export

11/08/2024
6:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/15/2024		Claims Administration and Objections: Meeting with C. Murray to review current status of terms of proposal for resolution of claims, waterfall, and sale (1.2); call with C. Murray, J. Wolfshohl, J. Chiba to review issues prior to call with Connecticut counsel (0.2); conference call with Connecticut counsel (0.8)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.20h	\$750.00	-	\$1,650.00
10/15/2024		Asset Analysis and Recovery: Review draft emergency motion to sell personal IP and discuss comments/revisions with C. Murray (1.0)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
10/15/2024		Asset Analysis and Recovery: Review correspondence from V. Driver regarding cease and desist and response to same and discuss same with C. Murray (0.4)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
10/15/2024		Asset Analysis and Recovery: Review status of ESG reporting and information provided to date, discuss status with C. Murray (0.7), and reach out to J. Patterson regarding time to discuss potential resolution of ESG adversary (0.1)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
10/16/2024		Fee/Employment Applications:	00040-Christopher Murray,	Apollo	2.70h	\$95.00	-	\$256.50
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

9/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Review docket and prepare additional analysis of chapter 11 professional fees for balances as requested by C. Murray (2.7) ● Unbilled	Chapter 7 Trustee In re Alexander E. Jones	Pham				
10/16/2024	🕒	Asset Analysis and Recovery: Review correspondence with M. Dearman regarding responding to inquiries regarding sale and conference with C. Murray regarding same (0.1) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.10h	\$750.00	-	\$75.00
10/17/2024	🕒	Case Administration: Review various emails from Trustee legal team regarding status of open issues and to schedule team meeting for next day (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
10/18/2024	🕒	Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (0.8) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	0.80h	\$495.00	-	\$396.00
10/18/2024	🕒	Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (0.8) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
10/18/2024	🕒	Claims Administration and Objections: Review correspondence from M. Dearman	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
					113.10h		\$0.00	\$73,653.50
							0.00h	113.10h
					10/22			

Activities Export










11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding framework of 9019 settlement (0.1), review draft terms of 9019 (0.3), and conference with M. Dearman, J. Wolfshohl, K. Starling and C. Murray regarding same (0.5) ● Unbilled						
10/18/2024	🕒	Asset Analysis and Recovery: Review various emails and draft of form asset purchase agreement and provide comments to C. Murray regarding same (0.9) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
10/21/2024	🕒	Claims Administration and Objections: Telephone conference with C. Murray regarding (0.5); telephone conference with K. Starling, C. Murray, M. Dearman regarding same (0.3); telephone conference with C. Murray and R. Mates regarding same (0.7); call M. Dearman to update regarding call with R. Mates (1.0); correspondence with M. Dearman regarding (0.6) and review by M. Dearman and respond to same (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	3.30h	\$750.00	-	\$2,475.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

11/22

Activities Export

11/08/2024
6:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/22/2024		Asset Analysis and Recovery: Multiple conferences with C. Murray regarding anticipated A. Jones objection to sale of personal IP (0.4)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
10/22/2024		Asset Analysis and Recovery: Review lengthy email inquiry regarding sale and forward to sales team for response to same and review responses from legal team regarding same (0.2)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
10/22/2024		Asset Analysis and Recovery: Review data relating to credit card processor (0.6); conference with C. Murray regarding strategy for recovery of same (0.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.10h	\$750.00	-	\$825.00
10/22/2024		Asset Analysis and Recovery: Review FSS office lease and amendments to same and discuss with C. Murray (0.3)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.30h	\$750.00	-	\$225.00
10/22/2024		Asset Analysis and Recovery: Review M. Dearman email regarding domains and various responses to same (0.2); conference call with C. Murray regarding same (0.4); review various emails and information relating to domains from B.	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.90h	\$750.00	-	\$675.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

12/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Schleizer and J. Tannenbaum (0.2); email to V. Driver to discuss personal IP and domains (0.1)						
		Unbilled						
10/22/2024		Asset Analysis and Recovery: Continue to review ESG related sales records and work through analysis / framework for resolution of disputes across categories (2.5); conference with C. Murray regarding same and review missing information and analysis of same (0.5); various emails with B. Schleizer and J. Shulse requesting additional information regarding ESG reportion and sales information and review responses to same (0.3); discuss responses to requests with C. Murray (0.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	3.50h	\$750.00	-	\$2,625.00
		Unbilled						
10/23/2024		Asset Analysis and Recovery: Conference call with C. Murray regarding various aspects of discussions with parties regarding resolution of claims (0.5); conference with C. Murray regarding ESG disputes and information gap (0.3); review various emails from J. Schulse regarding ESG reporting (0.2); review various emails with C. Murray and M. Dearman regarding additional information regarding domains (0.2); conference with C. Murray regarding same (0.2);	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.70h	\$750.00	-	\$1,275.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

Activities Export






11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		review various emails with C. Murray and K. Starling regarding FSS employee retention contracts and ordinary course employees (0.2); conference with C. Murray regarding same (0.1) ● Unbilled						
10/23/2024	🕒	Other Contested Matters: Review emails from K. Starling regarding motion to transfer venue and preparation for hearing including exhibits and electronic participation (0.3); review docket regarding same (0.2); review local rules and procedures regarding exhibits and witness presentation (0.2); conference with C. Murray in preparation for same (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
10/24/2024	🕒	Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (1.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.50h	\$495.00	-	\$742.50
10/24/2024	🕒	Asset Analysis and Recovery: Identify case information for divorce proceeding from Erika Jones and review docket/filings (0.4); initial review of pleadings filed and circulate analysis to E. Jones and C. Murray (1.0) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	1.40h	\$495.00	-	\$693.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

14/22

Activities Export

11/08/2024
6:58 PM

Date ▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/24/2024		Asset Analysis and Recovery: Perform legal research regarding (2.5)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	2.50h	\$495.00	-	\$1,237.50
10/24/2024		Asset Analysis and Recovery: Various conferences with J. Chiba regarding research relating to (0.5); conference with K. Starling regarding same (0.3); review materials from (0.5); review in light of (0.8); review legal research regarding (0.4)  Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.50h	\$750.00	-	\$1,875.00
10/24/2024		Asset Analysis and Recovery: Review A. Jones objection to sale of personal IP/social media accounts (0.8); conference with C. Murray regarding same (0.5); review authorities cited (0.6); conference with C. Murray regarding same (0.3); extended strategy call with M. Dearman, K. Starling, and J. Wolfshohl regarding response to A. Jones objection (0.8); various emails regarding proposed revised order (0.5); circulate draft proposed revised order and telephone conference with V. Driver regarding same (0.4); various	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	4.40h	\$750.00	-	\$3,300.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h 15/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		additional conferences with C. Murray and J. Wolfshohl regarding same to finalize revised proposed order and to discuss hearing (0.5) ● Unbilled						
10/24/2024	🕒	Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (1.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.50h	\$750.00	-	\$1,125.00
10/25/2024	🕒	Asset Analysis and Recovery: Begin comprehensive review and analysis of (3.4) and conference with E. Jones regarding same (1.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	4.90h	\$495.00	-	\$2,425.50
10/25/2024	🕒	Asset Analysis and Recovery: Pre-hearing call with C. Murray to discuss status of revised agreed proposed order and issues regarding hearing (0.6); meeting with C. Murray and J. Wolfshohl to prepare for hearing regarding same (1.0); represent trustee at hearing on emergency motion to sell personal IP (0.5); follow up meetings with legal team to discuss (0.6); conference with V. Driver regarding next steps (0.5)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	3.20h	\$750.00	-	\$2,400.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

16/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
10/25/2024	🕒	Asset Analysis and Recovery: Review email from M. Dearman regarding contested IP and review J. Tannenbaum email in response to same (0.3); conference with C. Murray regarding same (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
10/25/2024	🕒	Asset Analysis and Recovery: Conference with J. Chiba regarding (1.5); conference with C. Murray regarding same and (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.80h	\$750.00	-	\$1,350.00
10/25/2024	🕒	Asset Analysis and Recovery: Conference with C. Murray regarding retention of FA for estate (0.3) and various conferences regarding background and information needed to run conflicts with potential candidate regarding same (0.7) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.00h	\$750.00	-	\$750.00
10/25/2024	🕒	Asset Analysis and Recovery: Review schedules regarding issue of (1.8) and draft lengthy email to legal team summarizing same (0.5); review various responses to same (0.2); conference with C. Murray	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.70h	\$750.00	-	\$2,025.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

17/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding same (0.2) ● Unbilled						
10/25/2024	🕒	Asset Analysis and Recovery: Email to B. Schleizer and J. Schulse regarding status of ESG sales reporting needed (0.1) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.10h	\$750.00	-	\$75.00
10/25/2024	🕒	Other Contested Matters: Correspondence with K. Kimpler and L. Lieberman forwarding orders transferring venue as status update regarding same; conference with C. Murray regarding same and update regarding status of removed receivership matter (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.20h	\$750.00	-	\$150.00
10/25/2024	🕒	Claims Administration and Objections: Review terms of proposal for resolution of claims between creditors and conference with C. Murray regarding same (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.50h	\$750.00	-	\$375.00
10/26/2024	🕒	Claims Administration and Objections: Conference with C. Murray in preparation for discussion with Connecticut counsel regarding sale of IP and auction related issues (0.2); participate in telephone call with C. Murray and K. Kimpler regarding	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	2.00h	\$750.00	-	\$1,500.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

18/22

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		same (0.8); call with C. Murray regarding same and discussion of impact of personal IP/social media on timing of auction/sale process (1.0) ● Unbilled						
10/28/2024	🕒	Other Contested Matters: Continue review and prepare analysis of (4.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Jacqueline Chiba	4.20h	\$495.00	-	\$2,079.00
10/28/2024	🕒	Asset Analysis and Recovery: Conference with C. Murray regarding auction issues and sale of social media (0.9); conference with J. Wolfshohl regarding same (0.5); conference with C. Murray regarding ESG reporting and other (0.5) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.90h	\$750.00	-	\$1,425.00
10/29/2024	🕒	Other Contested Matters: Review clerk's notice of appeal deadlines (0.2); review Appellants' designation (0.4); email legal team regarding same (0.2) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.80h	\$750.00	-	\$600.00
10/29/2024	🕒	Asset Analysis and Recovery: Conference call with J. Tannenbaum and legal team regarding issues relating to auction and sale of FSS assets and social	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	6.30h	\$750.00	-	\$4,725.00
					113.10h		\$0.00 0.00h	\$73,653.50 113.10h

19/22


Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		media accounts (0.4); conference with C. Murray regarding same (0.3); review additional background relating including (1.0); call with C. Murray, J. Wolfshohl and M. Dearman regarding social media assets and continued hearing regarding same (0.4); additional conference call with M. Dearman and C. Murray regarding social media assets and revision of proposed order (0.9); additional correspondence regarding same (0.2); conference with C. Murray regarding FSS office lease and impact of termination / holdover in the event of any delay of auction/sale (0.5);						
		regarding and continue analysis regarding same (2.6)						
		● Unbilled						
10/30/2024	🕒	Asset Analysis and Recovery: Research documents/financial records in discovery database relating to (1.2)	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Apollo Pham	1.20h	\$95.00	-	\$114.00
		● Unbilled						
10/30/2024	🕒	Asset Analysis and Recovery: Review revisions to proposed order on emergency motion to sell personal IP with attached	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	7.40h	\$750.00	-	\$5,550.00
					113.10h		\$0.00	\$73,653.50
							0.00h	113.10h
					20/22			

Activities Export

11/08/2024
6:58 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		<p>schedules and discuss same with legal team and C. Murray (0.7); follow up with V. Driver regarding same (0.3); various conferences with C. Murray regarding issue raised by counsel for X (0.5); conduct legal research and draft various lengthy emails with legal team regarding</p> <p>to same (2.0); conference with C. Murray regarding same (0.5); review various emails from prospective buyer regarding lease issues and conference with C. Murray regarding same (0.4); call with L. Butler regarding lease terms and issues relating to holdover and termination (0.4); conference with C. Murray regarding same (0.2); draft summary of lease provisions and circulate to team (1.1); review additional reports on sales and payments made on various products and remaining inventory in relation to counterproposal to resolve dispute with ESG (0.9); email analysis of same to C. Murray and conference regarding same (0.2); forward same to J. Patterson (0.2)</p> <p>● Unbilled</p>						
10/31/2024		Case Administration: Weekly legal	00040-Christopher Murray,	Jacqueline	0.90h	\$495.00	-	\$445.50
					113.10h		\$0.00	\$73,653.50
							0.00h	113.10h
					21/22			

Activities Export

11/08/2024
6:58 PM

Date	▲	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			team strategy meeting to discuss pending matters, projects, and case status (0.9) ● Unbilled	Chapter 7 Trustee In re Alexander E. Jones	Chiba				
10/31/2024	🕒		Case Administration: Weekly legal team strategy meeting to discuss pending matters, projects, and case status (0.6) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.60h	\$750.00	-	\$450.00
10/31/2024	🕒		Asset Analysis and Recovery: Multiple calls with V. Driver regarding social media accounts and IP assets (0.8); conference with C. Murray regarding same (0.5); conference with M. Dearman regarding potential resolution of issues (0.3) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	1.60h	\$750.00	-	\$1,200.00
10/31/2024	🕒		Fee/Employment Applications: Telephone conference with potential FA for estate regarding connections/conflicts and scope of potential engagement (0.4) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
10/31/2024	🕒		Asset Analysis and Recovery: Telephone call with J. Patterson regarding framework for resolution of disputes with ESG in light of additional reporting (0.3); conference with C. Murray regarding same (0.1) ● Unbilled	00040-Christopher Murray, Chapter 7 Trustee In re Alexander E. Jones	Erin Jones	0.40h	\$750.00	-	\$300.00
						113.10h		\$0.00 0.00h	\$73,653.50 113.10h
22/22									

EXHIBIT 4

EXPENSE SUMMARY

EXPENSES	COST
Filing/Court Fees	\$750.00
Postage/Copies - Mailouts	\$1,315.77
Legal Research	\$1,247.20
Travel Expenses	\$2,115.45
Parking	\$64.20
TOTAL	\$5,442.62